



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 11 2015

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL # 7009 1680 0000 7644 8291**  
**RETURN RECEIPT REQUESTED**

Mr. Dan McCabe  
President  
Environmental Enterprises Incorporated  
10163 Cincinnati-Dayton Road  
Cincinnati, Ohio 45241

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA ID No.: OHD987048347

Dear Mr. McCabe:

On April 18 and 19, 2012, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected the Environmental Enterprises Inc. facility located in Cincinnati, Ohio (EEI). As a large quantity generator of hazardous waste, EEI is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate EEI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by EEI, EPA's review of records pertaining to EEI, and the inspector's observations, EPA has determined that EEI has unlawfully stored hazardous waste without a permit or interim status as a result of EEI's failure to comply with certain conditions for a permit exemption under Ohio Admin. Code § 3745-52-34(A)-(C)) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which EEI was out of compliance at the time of the inspection in paragraphs 4, 5 and 6, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 5 and 6 are also independent

TSD requirements incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256. Accordingly, each failure of EEI to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-54 to 57 [40 C.F.R. Part 264].

Finally, EPA has determined that EEI violated RCRA requirements related to hazardous waste determinations, recordkeeping and reporting as described in paragraphs 1- 3, below.

## **GENERATOR VIOLATIONS**

### **1. Hazardous Waste Determination**

Under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined at Ohio Admin. Code § 3745-51-02 [40 C.F.R. § 261.2] must determine if that waste is a hazardous waste using the following method: ... (D) If the waste is determined to be hazardous, the generator must refer to Chapters 3745-51, 3745-54 to 3745-57, 3745-65 to 3745-69, 3745-205, 3745-256, 3745-266, 3745-270, and 3745-273 of the Ohio Administrative Code [40 C.F.R. parts 261, 264, 265, 266, 267, 268, and 273] for possible exclusions or restrictions pertaining to management of the specific waste.

At the time of the inspection, EEI waste profiles Q1714, Q3672, X35373, X35374, and X64220 contained internally inconsistent hazardous waste determinations or did not identify land disposal restriction subcategories. For example, EEI waste profile Q1714 failed to identify common hazardous constituents of aerosol paint such as methyl ether ketone (MEK).

### **2. Hazardous Waste Recordkeeping**

Under Ohio Admin. Code ch. 3745-52-40(B) [40 C.F.R. § 262.40(b)], a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

At the time of the inspection, no annual or biennial reports were available on-site for review. Also, no manifest exception report was available.

### **3. Hazardous Waste Reporting**

Under Ohio Admin. Code ch. 3745-52-42(A)(1) [40 C.F.R. § 262.42(a)(2)], a generator of greater than one thousand kilograms of hazardous waste in a calendar month shall submit an exception report to the Ohio EPA if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within forty-five (45) days of the date the waste was accepted by the initial transporter. The exception report shall include:

- (a) A legible copy of the manifest for which the generator does not have confirmation of delivery; and
- (b) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

At the time of the inspection, an exception report had not been submitted to the Ohio EPA for manifest tracking number 001995991 FLE. EEI signed the generator's/offerer's certification on May 26, 2010. Midwest Environmental Transport, Inc. signed the transporters Acknowledgement of Receipt of Materials on May 26, 2010. The designated facility certified receipt of hazardous materials on July 13, 2010, 48 days later.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, EEI was out of compliance with the large quantity generator permit exemption conditions:

##### **4. Training**

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program *must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See Ohio Admin. Code ch. 3745-52-34 [40 C.F.R. § 262.34(a)] and 3745-65-16(A) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)].* Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(B) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].*

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(D) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, EEI prepared a list of each position at the facility related to hazardous waste management and the name of the employee filling such position(s). The individuals who signed hazardous waste manifests and completed waste profiles were noted.

Upon returning to the office, the EEI staff managing human resources provided, in response to an EPA request, a written position description for select employees whose work duties related to hazardous waste management at the facility. The Field Chemist position description includes preparing waste profiles and manifests and requires familiarity with RCRA regulations.

At the time of the inspection, EEI did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training given to employees related to hazardous waste determinations used to complete waste profiles and uniform hazardous waste manifests. In addition, the training certificates were signed by an individual identified as a "Certified Environmental Trainer – Management and Transportation of Hazardous Materials and Waste (CET)." The CET roster available in November 2012 did not include that individual.

**Summary:** By failing to comply with the conditions for a permit exemption, above, EEI became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. EEI failed to apply for such a permit. EEI's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 is also an independent violation of the corresponding TSD requirement.

The permit exemption conditions identified below in paragraphs 5 and 6 are also independent TSD requirements violated by EEI.



5. Contingency Plan

Owners and operators of all hazardous waste facilities must have a contingency plan for each facility. *See* Ohio Admin. Code ch. 3745-54-50 [40 C.F.R. § 264.50]. Under Ohio Admin. Code ch. 3745-54-42:

(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan" in accordance with 40 CFR Part 112 or 40 CFR Part 1510 or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-54 to 3745-57 of the Administrative Code [40 C.F.R. § 264.52(b)].

(D) The contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-54-55 of the Administrative Code), and this list must be kept up to date.

(E) The contingency plan must include a list of all emergency equipment of the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(F) The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

At the time of the inspection, EEI's list of emergency coordinators did not include home addresses. EEI's SPCC plan or Hazardous Materials and Waste Operations Health & Safety and Contingency Plan did not contain a diagram or map showing locations of emergency exits, evacuation route, decontamination equipment, spill response equipment, and fire extinguisher locations.

6. Testing and Maintenance of Equipment

Under Ohio Admin. Code ch. 3745-54-30 [40 C.F.R. § 264.30], preparedness and prevention regulations apply to owners and operators of all hazardous waste facilities. All facility communications or alarm systems, fire protection equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. Under Ohio Admin. Code ch. 3745-54-15(B) [40 C.F.R. § 264.15(b)], the owner or operator must develop and follow a written schedule for inspecting safety and emergency equipment that is important to

preventing or responding to environmental or human health hazards. At a minimum, the frequency of inspection must be no less than weekly, as specified for container storage areas. Under Ohio Admin. Code ch. 3745-54-15(D) [40 C.F.R. § 264.15(d)], the owner or operator must record inspections in an inspection log or summary.

At the time of the inspection, the spill response supplies were not included on the inspection form. A monthly inventory of all EEI's spill response supplies for on-site and off-site use satisfies this requirement. It would also be acceptable to reduce the list of spill response supplies to those appropriate for on-site hazardous waste generator use.

### **OTHER VIOLATIONS**

EEI violated the following transporter requirements:

#### **7. Transporter Storage of Hazardous Waste for Greater than Ten Days at Generator Facility**

Under Section 3005(a) of RCRA and 40 C.F.R. § 263.12, transporters of hazardous waste may not store hazardous waste for longer than ten days without applying for a permit.

At the time of the inspection, manifest number 001995991 FLE was reviewed. The manifest was signed by an employee of EEI on May 26, 2010 and received by the transporter on May 26, 2010. The designated facility certified receipt on July 13, 2010, 49 days later and in excess of the ten days allowed for transportation. Discussion with EEI revealed that the hazardous waste had been placed in a trailer and forgotten on-site; thus it was not, for example, inspected on a weekly basis for condition of containers.

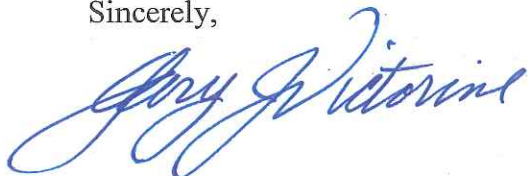
At this time, EPA is not requiring EEI to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 4, 5, and 6, above.

During the inspection, as observed by EPA, and after the inspection, as documented in letters dated May 5, 2012 and May 30, 2012 to EPA, you took certain actions to establish compliance with the above contingency plan and personnel training conditions requirements. Your letter or email did not include any actions you may have taken related to improving: 1) the quality of waste profiles including land disposal restriction classification; 2) maintaining a copy of the annual or biennial reports on-site; 3) the manifest exception reporting requirement; 4) a) establishing that the training provider is qualified for instruction in hazardous waste generator requirements and b) the quality and quantity of training devoted to RCRA waste determination compliance; 6) documenting addition of emergency equipment to the inspection checklist; and 7) a system to ensure that hazardous wastes are not placed in a trailer and forgotten for more than ten days. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under

Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1, 2, 3, 4, 6 and 7. You should submit your response to Ms. Sue Brauer, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sue Brauer, of my staff, at (312) 353-6134 or at [brauer.sue@epa.gov](mailto:brauer.sue@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Pam Hull, Ohio EPA, ([Pam.Hull@epa.ohio.gov](mailto:Pam.Hull@epa.ohio.gov)) w/enc.  
Teri Finfrock, Ohio EPA, ([Teri.Finfrock@epa.ohio.gov](mailto:Teri.Finfrock@epa.ohio.gov)) w/enc.

bcc: Brian Barwick, ORC (C-14J)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA Branch, LR-8J  
77 W. JACKSON BLVD.  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Environmental Enterprises Incorporated

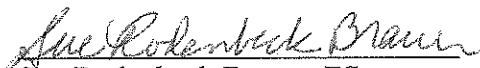
**EPA ID NUMBER:** OHD987048337

**ADDRESS:** 10163 Cincinnati-Dayton Road  
Cincinnati, Ohio 45241-2818

**DATE OF INSPECTION:** April 18-19, 2012

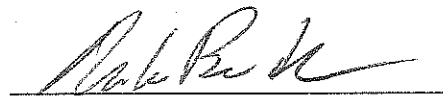
**EPA INSPECTOR:** Sue Rodenbeck Brauer  
Environmental Scientist (ES)

**PREPARED BY:**

  
Sue Rodenbeck Brauer, ES  
Compliance Section 2

Nov. 30, 2012  
Date

**ACCEPTED BY:**

  
Michael Beedle, Acting Chief  
Compliance Section 2

12/3/2012  
Date

### **Purpose of Inspection**

This inspection was an evaluation of Environmental Enterprises Incorporated's (EEI's) compliance with hazardous waste regulations found in Rules of Ohio Administrative Code (OAC) 3745 and Title 40 of the Code of Federal Regulations (C.F.R.). I performed the inspection with Pam Hull of Ohio EPA's Southwest District Office. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) large quantity generator (LQG) compliance evaluation inspection (CEI).

### **Participants**

#### *Inspectors:*

Sue Rodenbeck Brauer, EPA

Pam Hull, Ohio EPA (April 19, 2012 only)

#### *Site Representatives:*

Daniel J. McCabe, P.E., President

Brad Boyer, Manager, Environmental Services Division

### **Introduction**

On April 18, 2012, I arrived at the site at approximately 2:00 p.m. Eastern time. I introduced myself to the receptionist and presented a business card. She stated that this location is only corporate offices and that the lab closed in 2006. I spoke with a different employee (Dale) who stated that the site is only a transporter. The receptionist called Mr. McCabe at EEI's permitted facility. According to the receptionist, Mr. McCabe said that he would arrive in about twenty minutes. When Mr. McCabe arrived, I presented my inspector credentials and identification, and described the purpose of the inspection and the typical inspection process of obtaining general facility operation information, a facility tour, and records review. Mr. McCabe provided us with a verbal description of the site and its history. Mr. McCabe led the tour of the headquarters office building, including the laboratory which no longer operates. Mr. McCabe and EEI staff provided us with the records we requested for review.

I provided a Small Business Resources information sheet and Inspector Hull provided Ohio pollution prevention resources.

### **Site Description**

EEI has been owned and operated by Environmental Enterprises Inc. or Mr. McCabe since June 1, 1992, according to RCRAInfo, EPA's national database of hazardous waste notifiers. EEI notified as a LQG in 1993 and from 2000 annually to the present. Midwest Environmental Transport Inc. (OH0000000539) operates as a completely separate company on contiguous property and under common ownership as of 2006. EEI provides emergency spill response service to the southwest quadrant of the State of Ohio and to the U.S. Coast Guard. The Field Services Division of EEI operates from 7:00 a.m. to 4:30 p.m. five days a week and on call.

Mr. McCabe recalled that the lab on the lower level of the building ceased operations about four years ago. Lab services provided included Toxicity Characteristic Leaching Procedure, Atomic Absorption Spectrophotometry, Inductively Coupled Plasma-Mass Spectrometry or Atomic



Absorption Spectrophotometry, High Pressure Liquid Chromatography, Gas Chromatography/Mass Spectroscopy, bioassays, and electron microscopy. Thirty-four people were employed by the laboratory. Mr. McCabe recalled that five laboratories in Ohio closed that year. Mr. McCabe sold the equipment to Test America in Dayton, Ohio. A small lab for quality assurance and quality control is still operated at the permitted EEI plant nearby. Corporate operations involving personnel, administration, sales, and accounting continue at this location.

### **Site Tour**

On April 18, 2012, Mr. McCabe escorted me on the site inspection tour of the corporate headquarters building where we observed the former laboratory space. Aside from a couple of containers of nitric acid and soda ash and the ICP, all that remained of the lab operations were the cabinets and cupboards. Photographs of the former laboratory space are in Attachment A.

Mr. McCabe introduced the Inspectors to Mr. Brad Boyer of the Field Services Division of EEI. Mr. Boyer accompanied us to the transporter building where waste is generated from emergency response and occasionally equipment (e.g., box van) cleanout prior to repair. Mr. Boyer thought that the lab had closed in 2006. Inspector Hull took photographs during this portion of the inspection. Her photographs are also in Attachment A.

We observed at least six containers (drums, roll-off) of waste. Each of these containers had been stored for less than 90 days and each label identified the RCRA hazardous waste code.

On April 19, 2012, the inspectors went to the petroleum spill bay of the Field Services Division and observed a tarp-covered roll-off box full of carbon for use in emergency response. A second roll-off box contained debris and petroleum for solidification.

We also looked at used oil management at the truck service business in the same building (different doors). After viewing floor drains, I expressed concern that unless used oil is stored in a closed labeled container, anything could be mixed with it.

### **Records Review**

On April 18, we reviewed training records for the employees who signed as "generator" on manifests. The inspectors also reviewed manifests for calendar year 2010. All manifests I reviewed (eight in 2010) were filled out completely and were returned to the facility on time.

On April 18, I left the facility at 5:15 p.m. Eastern time.

On April 19, I arrived at the facility at 9:00 a.m. Eastern time.

I reviewed a contingency plan and observed that it did not include a map showing the locations of emergency exits, evacuation route, decontamination equipment, spill response equipment, and fire extinguisher locations. I provided a copy of OAC 3745-65-52 (D), (E), and (F) to Mr. McCabe. The inspectors recommended that a contingency plan diagram should identify the 90-day accumulation area.

I reviewed annual inventories received of hazardous waste for calendar years 2009, 2010, and 2011. Specific waste profiles were reviewed for adequate characterization of LDR underlying characteristics. Records reviewed include the "Environmental Enterprises, Inc. Confidential Waste Profile" forms for Approval #s Q1714, Q3672, X35373, X35374, and X64220.

Some of the information provided on the waste profile forms seemed counterintuitive to the Inspectors. For example, volatile organic compounds (VOC) categories on the form are "less than 100" or "greater than 100"; Total Organic Carbon is "less than 1%" or "greater than 1%"; British Thermal Units per pound (BTU/Pound) (X1000) options are "less than 2," "2 to 5," "5 to 10," "10 to 16," and "greater than 16." The inspectors would have guessed that the BTU/lb. value of aerosol paint would be greater than 2,000 per lb. and that the Total Organic Carbon (TOC) would be over 1 percent. In addition, some paints pigments contain metal elements, but no metals were identified as underlying hazardous constituents. Finally, while a VOC content over 100 ppm is credible, no common constituents of paint like MEK were identified as underlying hazardous constituents.

Waste Profile Review Table. The Hazardous Waste Method Management Codes (HWMMC) H061 and H141 are used in the table. Code H061 means "Fuel blending prior to energy recovery at another site (waste generated either on-site or received from off-site)" and H141 means "The site receiving this waste stored/bulked and transferred the waste with no treatment or recovery (H010-H129), fuel blending (H061), or disposal (H131-H135) at that receiving site" ([www.epa.gov/epawaste/inforesources/data/br11/br2011rpt.pdf](http://www.epa.gov/epawaste/inforesources/data/br11/br2011rpt.pdf), accessed 11/21/2012).

Approval #	Chemical Composition	BTU/lb.	Waste Codes HWMMC	TOC	Comments
Q1714	Aerosol paint 100%	<2,000	D001 (p. 1 & 2) H061	<1%	No LDR subcategory; VOCs > 100ppm
Q3672	T35 Tanker Cleanout; biodiesel (isobutane, cooking oil 100%)	<2,000	D001 (p. 1&2) H061	<1%	No LDR subcategory; VOCs > 100ppm
X35373	Mixed Liquids/Sludge	<2,000	D001 D022D035 F003 F005 (p. 1) D001 D004 D006 D007 D009 D010 D011 D018 D019 D022 D038 D039 (p. 2) H061	>1%	No LDR subcategories; >1% TOC so can be blended for burning; Waste codes differ pp. 1 to 2
X35374	Various Solids from Tanker Clean 100%	<2,000	D004 D006 D007 D008 D009 D010 D011 D018 D022 D039 (p.1) <b>H141</b> D004 D006 D007 D008 D009 D010 D011 D018 D022 D039 (p. 2)	blank	No LDR notification completed on form

Approval #	Chemical Composition	BTU/lb.	Waste Codes HWM/MC	TOC	Comments
X64220	Elemental mercury 5%; Sludge 80%; Liquid 20%; Debris 5%	<2,000	D009 H141 (p.1) D009 High Mercury Inorganics (>260)	<1%	Yes, contains underlying hazardous constituents (UHCs), but UHCs not "listed above" on p. 2

Training records were reviewed. Employees received an eight-hour HAZWOPER refresher in 2011. I expect this training to address the requirements of 29 C.F.R. § 1910.120(p)(8), "Emergency response program," including competence in the "recognition of health and safety hazards to protect themselves and other employees" (§ 1910.120(p)(8)(iii)(B)) and the hazard communication standard at 29 C.F.R. § 1910.1200. This training does not explicitly include generator hazardous waste determinations for RCRA compliance. The RCRA "Personnel Training" rule applicable to LQGs is found in the interim status standards for owners and operators of treatment, storage, and disposal facilities as referenced in the generator "Accumulation time" rule. The "Personnel Training" rule requires a program of classroom instruction or on-the-job training that teaches employees to perform their duties in a way that ensures the facility's compliance with the interim status standards relevant to the positions in which they are employed (paraphrase of OAC 3745-65-16 [40 C.F.R. § 265.16]). As a practical matter, at least one EEI position must include preparation of hazardous waste manifests that include the correct hazardous waste code(s), land disposal restriction underlying constituents and land disposal categories. Land disposal prohibitions are a material condition of the interim status standards. (See OAC 3745-65-1(E) [40 C.F.R. § 265.1(e)].) EEI position descriptions for Division Manager, Project Manager, Business Development Manager, Field Technician, CDL Driver, Field Supervisor, and Field Chemist were obtained.

In addition, the manifest identified by "Item 4. Manifest Tracking Number 001995991 FLE" was copied because the transporter acknowledged receipt of materials from the generator on May 26, 2010 and the designated facility certified receipt of manifested materials on July 13, 2010 (a difference of 49 days, including the end date).

I completed LQG and LQG LDR checklists during the records review. See Attachment B.

Select records copied during the inspection are in Attachment C.

#### **Closing Conference**

We summarized the contingency plan issues (home addresses, emergency equipment, evacuation plan), training for hazardous waste determination including underlying constituents, and waste profiles that appeared to have internal inconsistencies identified during the inspection. The inspection concluded at approximately 3 PM.

### **Inspection Follow-Up**

By letter dated May 4, 2012, Mr. McCabe provided:

- “Hazardous Materials and Waste Operations Health and Safety and Contingency Plan” for Butler County Department of Environmental Services, Hamilton County Environmental Services, HHW Permanent Collection Sites, 10163 Cincinnati-Dayton Road, Cincinnati, Ohio 45241 and 4600 Spring Grove Avenue, Cincinnati, Ohio 45232, Prepared by Environmental Assessment Group, Environmental Enterprises, Inc., 10163 Cincinnati-Dayton Road, Cincinnati, Ohio 45241 (24 pp.).
- “Spill Prevention Control and Countermeasures (SPCC) Plan” for Environmental Enterprises, Inc. Services, 10163 Cincinnati-Dayton Road, Cincinnati, Ohio 45241 (17 pp., including Equipment List -2 pp., Material List - 1 p., Phone Numbers – 1 p., “Plat of a Survey for The Wintz Properties, Inc. and Environmental Enterprises Incorp.” – 1 p., “Environmental Enterprises Inc. “Site Location” – 1 p. and “Field Service Emergency Floor Plan” – 1 p.).
- Copies of the Return Receipt green cards for Bethesda Care Sharonville (medical) and West Chester Fire Department, both dated 5/1/12 by the mail recipients.

By letter dated May 30, 2012, Mr. McCabe provided a TCLP VOC analytical report for a sample (sediment) from the trench drain and accumulators in the Midwest Fleet Services building.

### **Attachments**

Attachment A: Photographs (11 pp.)

Attachment B: Checklist (9 pp.)

Attachment C: Select Documents Copied (31 pp.)

Attachment D: Inspection Follow-Up (7 pp.)

**ATTACHMENT A**  
**Photographs**

Photo Log

Photographer: Sue Rodenbeck Brauer

Location: Environmental Enterprises Incorporated (EEI), OHD987048337

Date(s): April 18, 2012

Photo #	Description	(Date if more than 1- day and) Time
P4180102	Vacated lab benches in north-central lower level of EEI office building, looking northeast (NE).	4:03 p.m.
P4180103	Same open space as in P4180102, looking southeast (SE).	4:03 p.m.
P4180104	On the other side of the double doors in P4180103, looking SE to vacated lab.	4:03 p.m.
P4180105	Looking NE, to photographer's left from double doors in P4180103, to vacated lab.	4:03 p.m.
P4180106	Looking SW, to right from double doors in P4180103, to partitioned lab room.	4:04 p.m.
P4180107	Looking S into partitioned lab room from room in P4180105.	4:04 p.m.
P4180108	Looking SE at ICP in NE-most lab; this is the only remaining piece of commercial analytical equipment in the laboratory.	4:05 p.m.
P4180109	Looking SE at vacated lab benches in same room as ICP.	4:05 p.m.
P4180110	Looking north at fume hood in same general area as ICP.	4:07 p.m.
P4180111	Looking NE at wet lab bench in partitioned room NW of ICP.	4:07 p.m.
P4180112	Looking SW at a fume hood in a vacated wet chemistry laboratory SW of lab rooms shown in photos P4180102 – P4180111.	4:14 p.m.
P4180113	Similar wet chemistry laboratory as above with ovens.	4:14 p.m.
P4180114	Nitric Acid and Soda Ash are the only chemical reagents observed at this lab bench sink.	4:30 p.m.
P4180115	Mystery liquid containers, probably product, which Mr. McCabe believed could be used at the EEI TSD facility which has a lab.	4:32 p.m.

Photo Log

Photographer: Pam Hull, Ohio EPA

Location: Environmental Enterprises Incorporated (EEI), OHD987048337

Date(s): April 19, 2012

Photo #	Description
12eeilqgp001.jpg	View of hazardous waste drums in 90 day storage area
12eeilqgp002.jpg	Petroleum Spill Area - tarped roll off with virgin carbon and uncovered roll off with spill debris
12eeilqgp003.jpg	Petroleum Spill Area -- detail of trench in this building
12eeilqgp004.jpg	Petroleum Spill Area -- detail of another trench area in this building
12eeilqgp005.jpg	Petroleum Spill Area -- detail of accumulator in this building
12eeilqgp006.jpg	Petroleum Spill Area -- view of spill debris in uncovered rolloff box





P4180102



P4180103

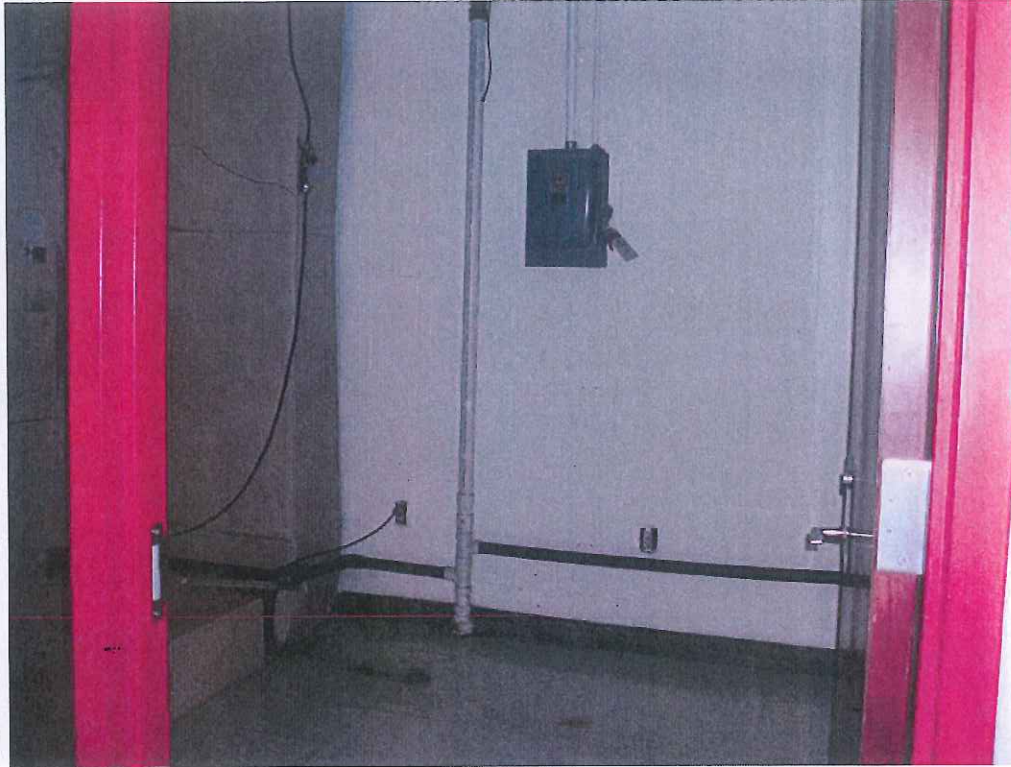


P4180104



P4180105

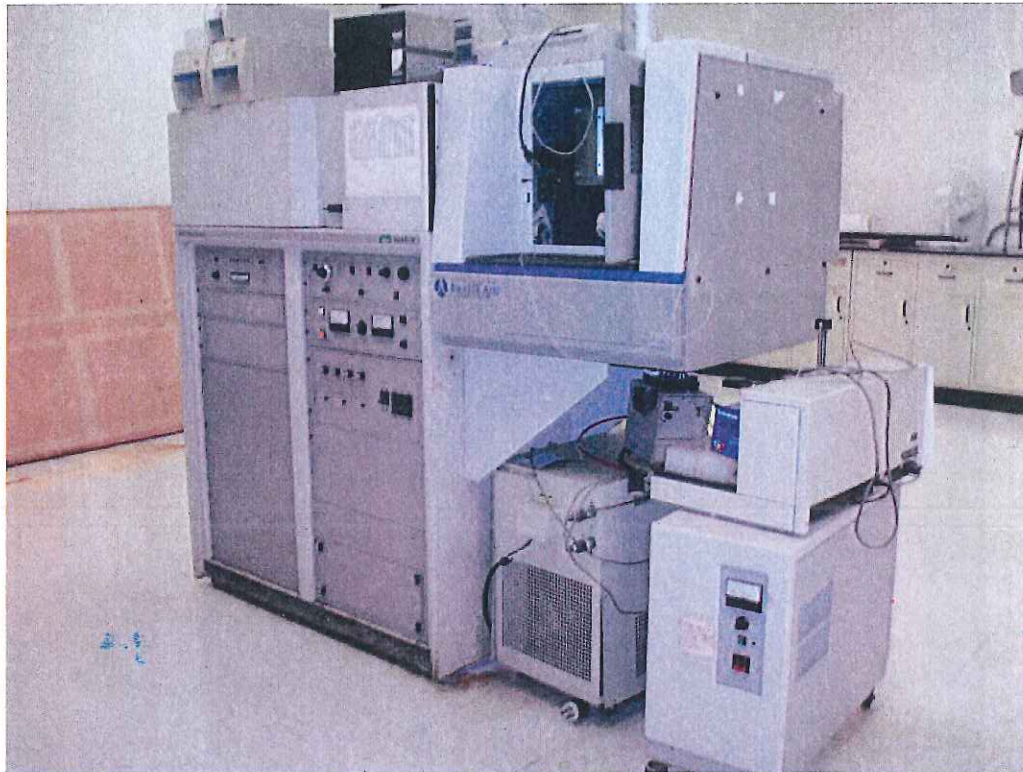




P4180106



P4180107



P4180108

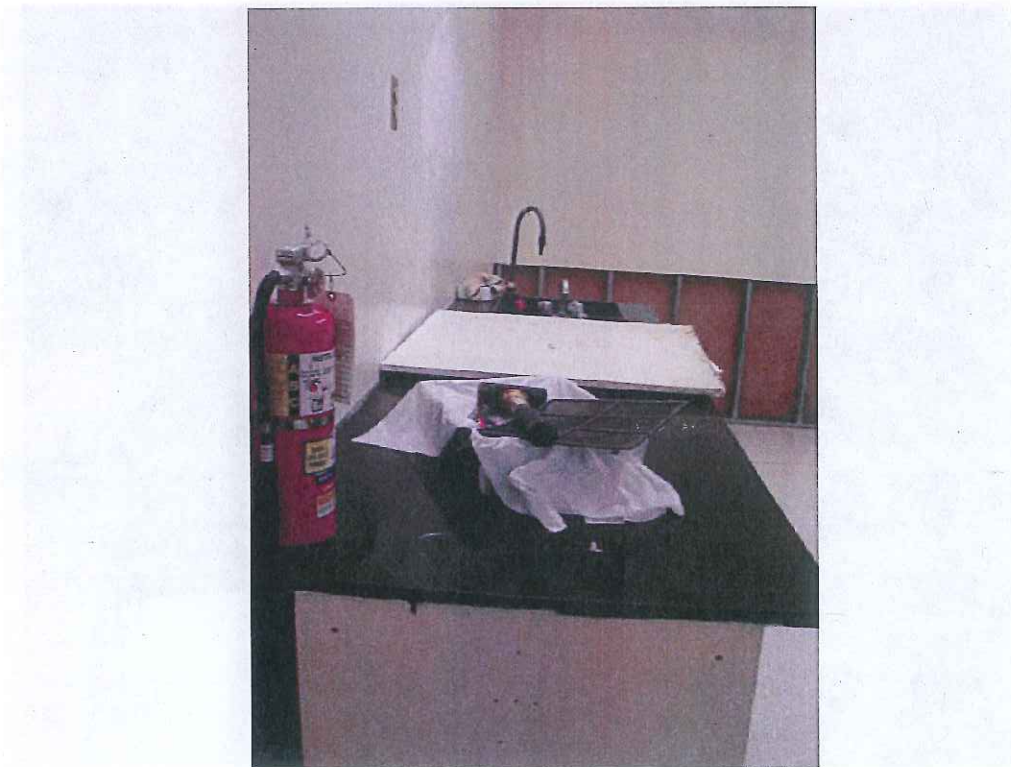


P4180109





P4180110



P4180111

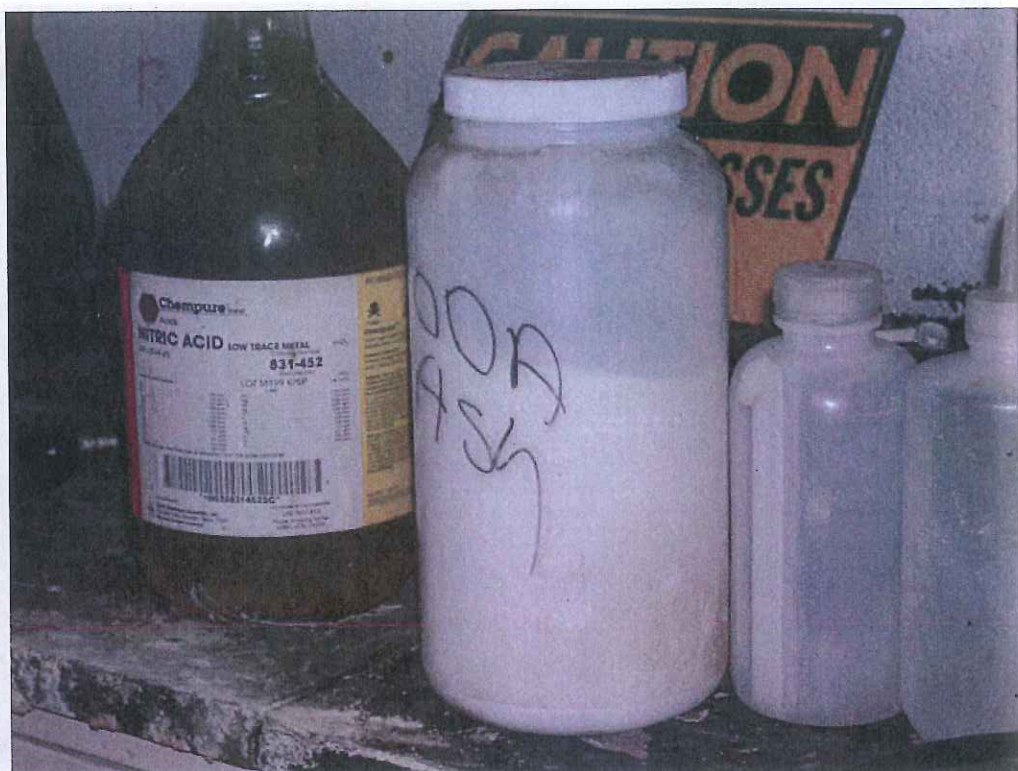


P4180112



P4180113





P4180114



P4180115



12eeilqgpic002



12eeilqgpic003





12eeilqgp004



12eeilqgp005



12eeilqgpic006

**ATTACHMENT B**  
**Checklist**





**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes, <i>X35373 include F003 + F005 D019, D039 on p.2, waste codes on p.1 &amp; p.2 don't match</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] <i>used generator knowledge + characteristic waste codes</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.		
NOTE: Written documentation of this determination is not required.		
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE If "Yes" see question #16.		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] <i>w/ each shipment</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] <i>w/ each shipment</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>		
11.	Does the LDR Notification form contain the following information:	
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	---	--

NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

#### PROHIBITED DILUTION

12.	Is the HW treated by burning? (H061)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
-----	--------------------------------------	--

If "No" go to #15.

13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
-----	-------------------------------	--

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	H061 does not contain metals - Q1714 & Q3672
-----	----	--	--

	i.	Contains > 1% TOC?	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	----	--	--

	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
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15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
-----	---	--

	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	----	---	--

NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code and contain ≥10% TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	--	---

	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	----	---	--

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

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GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.			
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM FOR GENERATOR TREATMENT			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-70-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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**LARGE QUANTITY GENERATOR REQUIREMENTS**  
**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)] <i>2011 3/1/12, 2010 3/1/11, 2009 3/1/10, 2008 3/2/09, 2007 3/3/08</i>	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)] <i>data used to prepare is available; reports not produced during time</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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b.	Job descriptions? [3745-65-16D(2)] <i>current job description records received</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*later out of office*

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
<i>See report and attachments.</i>	<i>Harold James 9/23/08</i>	<i>9/8/97, 1/25/12</i>
	<i>Ronald Clark 8/14/01</i>	<i>11/15/03, 12/16/11</i>

### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)] <i>nearest medical w/ map plan review TBD</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] <i>yes as of 5/4/12</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] <i>yes as of 5/4/12</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] <i>yes as of 5/4/12</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] <i>no green cards by 5/4/12 SRB</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] <i>no changes between PG cards</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

### EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.				
<b>PREPAREDNESS AND PREVENTION</b>				
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system? [3745-65-32(A)] <i>preprogrammed cell phones</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] <i>bdy sprinklered Cincinnati Fire Prot. plan for</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.				
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] <i>supervisor inspect</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] <i>annual inspection no other contact</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b> <i>NONE</i>				
43.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:			
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] <i>25' or more separation would be used</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
-----	--	------------------------------	-----------------------------	---

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

#### PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
-----	---	---	-----------------------------	------------------------------

37 and 48 Dan has to ask whether there is a record of inspections.

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**ATTACHMENT C**  
**Documents Copied**





*EEPA*

**Daniel J. McCabe, P.E.**  
President

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**Environmental Enterprises Incorporated**

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*Taft Sanitary Eng. Ctr. Cincinnati, OH*



John R. Kasich, Governor  
Scott J. Nally, Director  
[www.epa.ohio.gov/swdo](http://www.epa.ohio.gov/swdo)

**Environmental  
Protection Agency**

**Pam Hull**  
*Division of Materials & Waste Management*

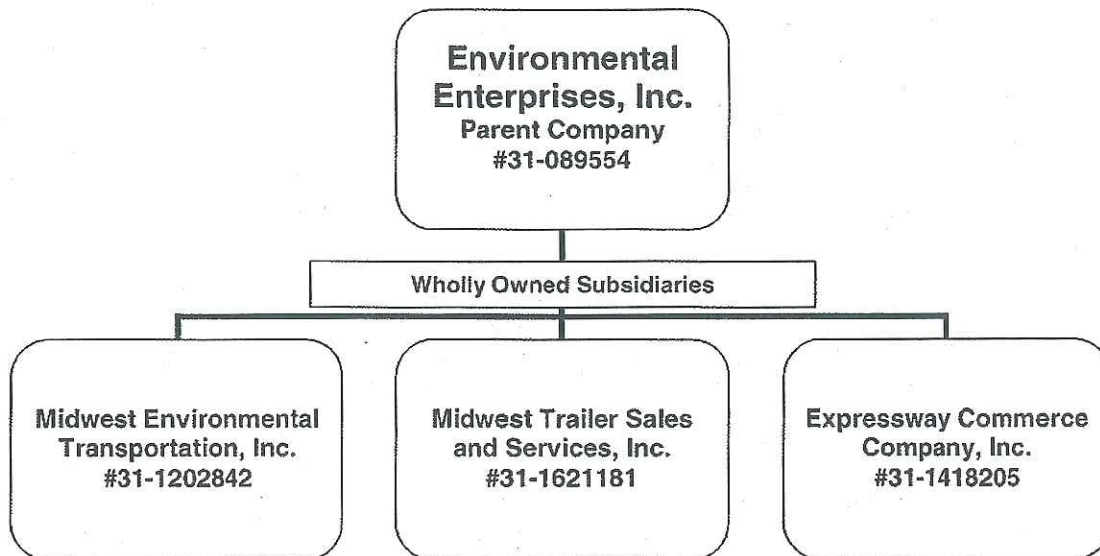
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*sold it  
corp. inactive  
expected to be  
dissolved  
(have to have  
no assets or  
bills before  
dissolving)*

*owner of TSD bldg.*





FOR EEI USE ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # <u>Q1714</u> (completed by EEI) Sales Code <u>KWISE</u>
---	--	---

(A) GENERAL INFORMATION			
Customer Reference # _____		Billing Name <u>Environmental Enterprises Inc - ESD</u>	
Generator Name <u>Environmental Enterprises Inc</u>		Contact Name <u>Brad Boyer</u>	
Contact Name <u>Harold James II</u>		Address <u>10163 Cincinnati-Dayton Rd</u>	
Address <u>10163 Cincinnati-Dayton Rd.</u>		City <u>Cincinnati</u>	
City <u>Cincinnati</u>		State <u>OH</u> Zip <u>45241-</u>	
State <u>OH</u> Zip <u>45241-</u>		Phone # <u>(513) 672-8154</u>	
Phone # <u>(513) 672-8154</u>		Fax # _____	
USEPA ID# <u>OHD987048337</u>			

(B) GENERAL WASTE INFORMATION			
Name of Waste <u>Aerosols</u>			
Process Generating <u>Clean Out from Field Service</u>			
Anticipated Volume <u>Varies</u>	Units: <input checked="" type="checkbox"/> Drums <input type="checkbox"/> Gallons	Frequency: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly	
	<input type="checkbox"/> Tons <input type="checkbox"/> Yards	<input checked="" type="checkbox"/> Yearly <input type="checkbox"/> OneTime	
Size and Type of Container <u>Loose Pack</u>			
DOT Shipping Name <u>Waste Aerosols</u>			
Hazard Class <u>2.1</u>	UN/NA # <u>UN1950</u>	Packing Group _____	
Special Handling or Precautions <u>FULL PPE</u>	Sample Included? <input type="checkbox"/>		

(C) RCRA CHARACTERISTICS			
RCRA Waste Codes <u>D001</u>	F001-F005 Solvent Waste	<input type="checkbox"/>	
Form Code <u>W801</u>	Waste is used in electroplating	<input type="checkbox"/>	
Virgin Product <input type="checkbox"/>	Spill Cleanup	<input type="checkbox"/>	
MSDS Attached <input type="checkbox"/>	Debris	<input type="checkbox"/>	

(D) CHEMICAL COMPOSITION			Is Waste:		Odor	Color
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.					<input type="checkbox"/> None	Varies
					<input checked="" type="checkbox"/> Mild	
					<input type="checkbox"/> Strong	
Constituent	Actual	Range	<input type="checkbox"/> Radioactive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> OSHA Carcinogen <input type="checkbox"/> Explosive <input type="checkbox"/> Pesticide <input type="checkbox"/> Polymerizable <input type="checkbox"/> Organic Peroxide <input type="checkbox"/> Infectious <input type="checkbox"/> Pyrophoric (a blank box indicates "No")		% Water	
<u>Aerosol Paint</u>	100%	%			<input checked="" type="checkbox"/> <5 <input type="checkbox"/> >20 <input type="checkbox"/> 5-10 Actual _____ <input type="checkbox"/> 10-20	
					% Halogens	
					<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 10-20 <input type="checkbox"/> 1-5 <input type="checkbox"/> >20 <input type="checkbox"/> 5-10 Actual _____	
					pH	
					<input type="checkbox"/> <2 <input type="checkbox"/> 8-10 <input type="checkbox"/> 2-4 <input type="checkbox"/> 10-12.5 <input type="checkbox"/> 4-6 <input type="checkbox"/> >12.5 <input checked="" type="checkbox"/> 6-8 Actual: _____	
					Flash Point F° (closed cup)	
					<input checked="" type="checkbox"/> <100 <input type="checkbox"/> >200 <input type="checkbox"/> 100-140 Actual _____ <input type="checkbox"/> 140-200	

☐ Contains TRI chemical above DeMinimus concentration. Actual concentration/range must be reported for each.

<b>Physical State</b> <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Sludge-Amount <input type="checkbox"/> Fused <input type="checkbox"/> Gas Other: _____	<b>Layers</b> <input checked="" type="checkbox"/> Single <input type="checkbox"/> Bi <input type="checkbox"/> Multi	<b>BTU/Pound (X1000)</b> <input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16 <input type="checkbox"/> 2-5 <input type="checkbox"/> >16 <input type="checkbox"/> 5-10 Actual _____	<b>Total Suspended Solids (% wt.)</b> <input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20 <input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20	<b>Viscosity</b> <input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High
--	--	--	---	---

App Date: <u>1/13/2010</u> Exp Date: <u>1/13/2011</u> Status: <u>Approved</u>	Price: <u>SHRED1 \$0.40/lb; \$110.00/55 Gallon Minimum</u>
WasteCodes: <u>D001</u>	<u>\$0.40/lb; \$110.00/55 Gallon Minimum</u>
Restricted <input checked="" type="checkbox"/>	Comments: <u>Please Weigh</u>
M Code <u>H061</u>	Notes: _____
Handling Codes: <u>T04 Crush</u>	Special Precautions: _____
Facility: <u>Essroc</u>	
EEI PSS#: _____	Equipment: <u>FULL PPE</u>

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D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input checked="" type="checkbox"/> D001	Ignitable Liquids (f.p. <°F)		<input type="checkbox"/> D015	Toxaphene >0.5 mg/l
<input checked="" type="checkbox"/>	Ignitable liquids		<input type="checkbox"/> D016	2,4-D >10.0 mg/l
<input type="checkbox"/>	Oxidizers	<input type="checkbox"/> High TOC (>10%) NW	<input type="checkbox"/> D017	2,4,5-TP Silvex >1.0 mg/l
<input type="checkbox"/>	Reactives	<input type="checkbox"/> Low TOC (<10%) NWW	<input type="checkbox"/> D018	Benzene >0.5 mg/l
<input type="checkbox"/>	Compressed Gases		<input type="checkbox"/> D019	Carbon Tetrachloride >0.5 mg/l
<input type="checkbox"/> D002	Corrosive (pH<2 or >12.5)		<input type="checkbox"/> D020	Chlordane >0.03 mg/l
<input type="checkbox"/>	Acid Liquids	<input type="checkbox"/> Alkaline Liquids	<input type="checkbox"/> D021	Chlorobenzene >100.0 mg/l
<input type="checkbox"/>	Other Corrosive Liquids		<input type="checkbox"/> D022	Chloroform >6.0 mg/l
<input type="checkbox"/> D003	Reactive		<input type="checkbox"/> D023	o-Cresol >200.0 mg/l
<input type="checkbox"/>	Reactive Sulfides	<input type="checkbox"/> Reactive Cyanides	<input type="checkbox"/> D024	m-Cresol >200.0 mg/l
<input type="checkbox"/>	Water Reactives	<input type="checkbox"/> Explosives	<input type="checkbox"/> D025	p-Cresol >200.0 mg/l
<input type="checkbox"/>	Other Reactives		<input type="checkbox"/> D026	Cresol >200.0 mg/l
<input type="checkbox"/> D004	Arsenic >5.0 mg/l		<input type="checkbox"/> D027	1,4-Dichlorobenzene >7.5 mg/l
<input type="checkbox"/> D005	Barium >100.0 mg/l		<input type="checkbox"/> D028	1,2-Dichloroethane >0.5 mg/l
<input type="checkbox"/> D006	Cadmium >1.0 mg/l		<input type="checkbox"/> D029	1,1-Dichloroethylene >0.7 mg/l
<input type="checkbox"/>	Cadmium Batteries		<input type="checkbox"/> D030	2,4-Dinitrotoluene >0.13 mg/l
<input type="checkbox"/> D007	Chromium >5.0 mg/l		<input type="checkbox"/> D031	Heptachlor(and its epoxide) >0.0008 mg/l
<input type="checkbox"/> D008	Lead >5.0 mg/l		<input type="checkbox"/> D032	Hexachlorobenzene >0.13 mg/l
<input type="checkbox"/>	Lead Acid Batteries		<input type="checkbox"/> D033	Hexachlorobutadiene >0.5 mg/l
<input type="checkbox"/> D009	Mercury >0.2 mg/l		<input type="checkbox"/> D034	Hexachloroethane >3.0 mg/l
<input type="checkbox"/>	High Mercury Organics (>260 mg/kg Total)		<input type="checkbox"/> D035	Methyl ethyl ketone >200.0 mg/l
<input type="checkbox"/>	High Mercury Inorganics (>260 mg/kg Total)		<input type="checkbox"/> D036	Nitrobenzene >2.0 mg/l
<input type="checkbox"/>	Incin. Residues		<input type="checkbox"/> D037	Pentachlorophenol >100.0 mg/l
<input type="checkbox"/>	Low Mercury (<260 mg/kg Total)		<input type="checkbox"/> D038	Pyridine >5.0 mg/l
<input type="checkbox"/> D010	Selenium >1.0 mg/l		<input type="checkbox"/> D039	Tetrachloroethylene >0.7 mg/l
<input type="checkbox"/> D011	Silver >5.0 mg/l		<input type="checkbox"/> D040	Trichloroethylene >0.5 mg/l
<input type="checkbox"/> D012	Endrin >0.02 mg/l		<input type="checkbox"/> D041	2,4,5-Trichlorophenol >400.0 mg/l
<input type="checkbox"/> D013	Lindane >0.4 mg/l		<input type="checkbox"/> D042	2,4,6-Trichlorophenol >2.0 mg/l
<input type="checkbox"/> D014	Methoxychlor >10.0 mg/l		<input type="checkbox"/> D043	Vinyl Chloride >0.2 mg/l

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☐ Yes (if "Yes" complete Question 2 below) ☒ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input type="checkbox"/> <100ppm <input checked="" type="checkbox"/> >100 ppm		Cyanide Total	<input checked="" type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input checked="" type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input checked="" type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input checked="" type="checkbox"/> <1% <input type="checkbox"/> >1%		Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions)

☐ does not meet any applicable standards

☐ treated to meet all applicable standards

☐ meets all applicable standards without treatment

☒ needs to be treated to meet certain treatment standards

☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above

2b. ☐ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land dispose

3. The above information was determined by:

☒ Generator's knowledge of the waste

☐ Laboratory analysis (attached)

#### Benzene NESHP Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery ☐ Yes ☒ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHP) ☐ Yes ☒ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 60012-80018 or my thorough knowledge of the waste.

Signature \_\_\_\_\_ Title C-4 Date \_\_\_\_\_





FOR EEI USE ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # <u>Q1714</u> (completed by EEI) Sales Code <u>KWISE</u>
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Customer Reference # _____		(A) GENERAL INFORMATION	
Generator Name <u>Environmental Enterprises Inc</u>		Billing Name <u>Environmental Enterprises Inc - ESD</u>	
Contact Name <u>Harold</u>	Contact Name <u>James II</u>	Contact Name <u>Brad</u>	Contact Name <u>Boyer</u>
Address <u>10163 Cincinnati-Dayton Rd.</u>		Address <u>10163 Cincinnati-Dayton Road</u>	
City <u>Cincinnati</u>		City <u>Cincinnati</u>	
State <u>OH</u>	Zip <u>45241-</u>	State <u>OH</u>	Zip <u>45241-</u>
Phone # <u>(513) 672-8154</u>		Phone # <u>(513) 772-2818</u>	
Fax # <u>(513) 672-8155</u>		Fax # _____	
USEPA ID# <u>OHD987048337</u>			

(B) GENERAL WASTE INFORMATION			
Name of Waste <u>Aerosols</u>			
Process Generating <u>Clean Out from Field Service</u>			
Anticipated Volume <u>Varies</u>	Units: <input checked="" type="checkbox"/> Drums <input type="checkbox"/> Gallons	Frequency: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly	
	<input type="checkbox"/> Tons <input type="checkbox"/> Yards	<input checked="" type="checkbox"/> Yearly <input type="checkbox"/> OneTime	
Size and Type of Container <u>Loose Pack</u>			
DOT Shipping Name <u>Waste Aerosols</u>			
Hazard Class <u>2.1</u>	UN/NA # <u>UN1950</u>	Packing Group _____	
Special Handling or Precautions <u>FULL PPE</u>	Sample Included? <input type="checkbox"/>		

(C) RCRA CHARACTERISTICS			
RCRA Waste Codes <u>D001</u>	F001-F005 Solvent Waste <input type="checkbox"/>		
Form Code <u>W801</u>	Waste is used in electroplating <input type="checkbox"/>		
Virgin Product <input type="checkbox"/>	Spill Cleanup <input type="checkbox"/>		
MSDS Attached <input type="checkbox"/>	Debris <input type="checkbox"/>		

(D) CHEMICAL COMPOSITION			<b>Is Waste:</b> Radioactive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> OSHA Carcinogen <input type="checkbox"/> Explosive <input type="checkbox"/> Pesticide <input type="checkbox"/> Polymerizable <input type="checkbox"/> Organic Peroxide <input type="checkbox"/> Infectious <input type="checkbox"/> Pyrophoric <input type="checkbox"/> (a blank box indicates "No")	<b>Odor</b> <input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong	<b>Color</b> Varies
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.					
Constituent	Actual	Range			
<u>Aerosol Paint</u>	100%	%			

☐ Contains TRI chemical above DeMinimus concentration. Actual concentration/range must be reported for each.

<b>Physical State</b> <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Sludge-Amount <input type="checkbox"/> Fused <input type="checkbox"/> Gas	<b>Layers</b> <input checked="" type="checkbox"/> Single <input type="checkbox"/> Bi <input type="checkbox"/> Multi	<b>BTU/Pound (X1000)</b> <input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16 <input type="checkbox"/> 2-5 <input type="checkbox"/> >16 <input type="checkbox"/> 5-10 Actual _____	<b>Total Suspended Solids (% wt.)</b> <input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20 <input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20	<b>Viscosity</b> <input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High
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App Date: <u>1/13/2010</u> Exp Date: <u>1/13/2011</u> Status: <u>Approved</u>	Price: <u>SHRED1 \$0.40/lb; \$110.00/55 Gallon Minimum</u>
WasteCodes: <u>D001</u>	<u>\$0.40/lb; \$110.00/55 Gallon Minimum</u>
Restricted <input checked="" type="checkbox"/>	Comments: <u>Please Weigh</u>
M Code <u>H061</u>	Notes: _____
Handling Codes: <u>T04 Crush</u>	Special Precautions: _____
Facility: <u>Essroc</u>	
EEI PSS#: _____	Equipment: <u>FULL PPE</u>

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D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input checked="" type="checkbox"/> <b>D001</b> Ignitable Liquids (f.p. <°F)			<input type="checkbox"/> <b>D015</b> Toxaphene >0.5 mg/l	
<input checked="" type="checkbox"/> Ignitable liquids	<input type="checkbox"/> High TOC (>10%) NW		<input type="checkbox"/> <b>D016</b> 2,4-D >10.0 mg/l	
<input type="checkbox"/> Oxidizers	<input type="checkbox"/> Low TOC (<10%) NWW		<input type="checkbox"/> <b>D017</b> 2,4,5-TP Silvex >1.0 mg/l	
<input type="checkbox"/> Reactives			<input type="checkbox"/> <b>D018</b> Benzene >0.5 mg/l	
<input type="checkbox"/> Compressed Gases			<input type="checkbox"/> <b>D019</b> Carbon Tetrachloride >0.5 mg/l	
<input type="checkbox"/> <b>D002</b> Corrosive (pH<2 or >12.5)			<input type="checkbox"/> <b>D020</b> Chlordane >0.03 mg/l	
<input type="checkbox"/> Acid Liquids	<input type="checkbox"/> Alkaline Liquids		<input type="checkbox"/> <b>D021</b> Chlorobenzene >100.0 mg/l	
<input type="checkbox"/> Other Corrosive Liquids			<input type="checkbox"/> <b>D022</b> Chloroform >6.0 mg/l	
<input type="checkbox"/> <b>D003</b> Reactive			<input type="checkbox"/> <b>D023</b> o-Cresol >200.0 mg/l	
<input type="checkbox"/> Reactive Sulfides	<input type="checkbox"/> Reactive Cyanides		<input type="checkbox"/> <b>D024</b> m-Cresol >200.0 mg/l	
<input type="checkbox"/> Water Reactives	<input type="checkbox"/> Explosives		<input type="checkbox"/> <b>D025</b> p-Cresol >200.0 mg/l	
<input type="checkbox"/> Other Reactives			<input type="checkbox"/> <b>D026</b> Cresol >200.0 mg/l	
<input type="checkbox"/> <b>D004</b> Arsenic >5.0 mg/l			<input type="checkbox"/> <b>D027</b> 1,4-Dichlorobenzene >7.5 mg/l	
<input type="checkbox"/> <b>D005</b> Barium >100.0 mg/l			<input type="checkbox"/> <b>D028</b> 1,2-Dichloroethane >0.5 mg/l	
<input type="checkbox"/> <b>D006</b> Cadmium >1.0 mg/l			<input type="checkbox"/> <b>D029</b> 1,1-Dichloroethylene >0.7 mg/l	
<input type="checkbox"/> Cadmium Batteries			<input type="checkbox"/> <b>D030</b> 2,4-Dinitrotoluene >0.13 mg/l	
<input type="checkbox"/> <b>D007</b> Chromium >5.0 mg/l			<input type="checkbox"/> <b>D031</b> Heptachlor(and its epoxide) >0.0008 mg/l	
<input type="checkbox"/> <b>D008</b> Lead >5.0 mg/l			<input type="checkbox"/> <b>D032</b> Hexachlorobenzene >0.13 mg/l	
<input type="checkbox"/> Lead Acid Batteries			<input type="checkbox"/> <b>D033</b> Hexachlorobutadiene >0.5 mg/l	
<input type="checkbox"/> <b>D009</b> Mercury >0.2 mg/l			<input type="checkbox"/> <b>D034</b> Hexachloroethane >3.0 mg/l	
<input type="checkbox"/> High Mercury Organics (>260 mg/kg Total)			<input type="checkbox"/> <b>D035</b> Methyl ethyl ketone >200.0 mg/l	
<input type="checkbox"/> High Mercury Inorganics (>260 mg/kg Total)			<input type="checkbox"/> <b>D036</b> Nitrobenzene >2.0 mg/l	
<input type="checkbox"/> Incin. Residues			<input type="checkbox"/> <b>D037</b> Pentachlorophenol >100.0 mg/l	
<input type="checkbox"/> Low Mercury (<260 mg/kg Total)			<input type="checkbox"/> <b>D038</b> Pyridine >5.0 mg/l	
<input type="checkbox"/> <b>D010</b> Selenium >1.0 mg/l			<input type="checkbox"/> <b>D039</b> Tetrachloroethylene >0.7 mg/l	
<input type="checkbox"/> <b>D011</b> Silver >5.0 mg/l			<input type="checkbox"/> <b>D040</b> Trichloroethylene >0.5 mg/l	
<input type="checkbox"/> <b>D012</b> Endrin >0.02 mg/l			<input type="checkbox"/> <b>D041</b> 2,4,5-Trichlorophenol >400.0 mg/l	
<input type="checkbox"/> <b>D013</b> Lindane >0.4 mg/l			<input type="checkbox"/> <b>D042</b> 2,4,6-Trichlorophenol >2.0 mg/l	
<input type="checkbox"/> <b>D014</b> Methoxchlor >10.0 mg/l			<input type="checkbox"/> <b>D043</b> Vinyl Chloride >0.2 mg/l	

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☐ Yes (if "Yes" complete Question 2 below) ☒ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input type="checkbox"/> <100ppm <input checked="" type="checkbox"/> >100 ppm		Cyanide Total	<input checked="" type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input checked="" type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input checked="" type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input checked="" type="checkbox"/> <1% <input type="checkbox"/> >1%		Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions

☐ does not meet any applicable standards

☐ treated to meet all applicable standards

☐ meets all applicable standards without treatment

☒ needs to be treated to meet certain treatment standards

☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above

2b. ☐ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land dispose

3. The above information was determined by:

☒ Generator's knowledge of the waste

☐ Laboratory analysis (attached)

#### Benzene NESHAP Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery ☐ Yes ☒ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHAP) ☐ Yes ☒ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 60012-80018 or my thorough knowledge of the waste.

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

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<b>FOR EEI USE</b> ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # Q3672 (completed by EEI) Sales Code <u>KWISE</u>
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Customer Reference # _____		<b>(A) GENERAL INFORMATION</b>	
Generator Name <u>Environmental Enterprises Inc</u>	Billing Name <u>Environmental Enterprises Inc - ESD</u>		
Contact Name <u>Harold James II</u>	Contact Name <u>Brad Boyer</u>		
Address <u>10163 Cincinnati-Dayton Rd.</u>	Address <u>10163 Cincinnati-Dayton Road</u>		
City <u>Cincinnati</u>	City <u>Cincinnati</u>		
State <u>OH</u> Zip <u>45241-</u>	State <u>OH</u> Zip <u>45241-</u>		
Phone # <u>(513) 672-8154</u>	Phone # <u>(513) 772-2818</u>		
Fax # <u>(513) 672-8155</u>	Fax # _____		
USEPA ID# <u>OHD987048337</u>			

<b>(B) GENERAL WASTE INFORMATION</b>			
Name of Waste <u>Bio-Diesel</u>			
Process Generating <u>Tanker Clean Out</u>			
Anticipated Volume <u>3</u>	Units: <input checked="" type="checkbox"/> Drums <input type="checkbox"/> Gallons <input type="checkbox"/> Tons <input type="checkbox"/> Yards	Frequency: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Yearly <input checked="" type="checkbox"/> OneTime	
Size and Type of Container <u>55 Gallon Poly Drum</u>			
DOT Shipping Name <u>Waste Flammable liquids, n.o.s.</u>			
Hazard Class <u>3</u>	UN/NA # <u>UN1993</u>	Packing Group <u>III</u>	
Special Handling or Precautions <u>Full PPE</u>	Sample Included? <input type="checkbox"/>		

<b>(C) RCRA CHARACTERISTICS</b>	
RCRA Waste Codes <u>D001</u>	F001-F005 Solvent Waste <input type="checkbox"/>
Form Code <u>W203</u>	Waste is used in electroplating <input type="checkbox"/>
Virgin Product <input type="checkbox"/>	Spill Cleanup <input type="checkbox"/>
MSDS Attached <input type="checkbox"/>	Debris <input type="checkbox"/>

<b>(D) CHEMICAL COMPOSITION</b>			<b>Is Waste</b>		<b>Odor</b>	<b>Color</b>
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.			<input type="checkbox"/> Radioactive <input type="checkbox"/> Water Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> OSHA Carcinogen <input type="checkbox"/> Explosive <input type="checkbox"/> Pesticide <input type="checkbox"/> Polymerizable <input type="checkbox"/> Organic Peroxide <input type="checkbox"/> Infectious <input type="checkbox"/> Pyrophoric (a blank box indicates "No")		<input checked="" type="checkbox"/> None <input type="checkbox"/> Mild <input type="checkbox"/> Strong	Golden
<b>Constituent</b>	<b>Actual</b>	<b>Range</b>				
from EEI Plant	%					
T35 Tanker Clean Out from materi	%					
Bio-Diesel (Isobutane, Cooking Oil 100%	%					
			<b>Flash Point F°</b> (closed cup)			
			<input type="checkbox"/> <100 <input type="checkbox"/> >200 <input checked="" type="checkbox"/> 100-140 Actual _____ <input type="checkbox"/> 140-200			
					<b>% Water</b>	
					<input type="checkbox"/> <5 <input checked="" type="checkbox"/> >20 <input type="checkbox"/> 5-10 Actual _____ <input type="checkbox"/> 10-20	
					<b>% Halogens</b>	
					<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 10-20 <input type="checkbox"/> 1-5 <input type="checkbox"/> >20 <input type="checkbox"/> 5-10 Actual _____	
					<b>pH</b>	
					<input type="checkbox"/> <2 <input type="checkbox"/> 8-10 <input type="checkbox"/> 2-4 <input type="checkbox"/> 10-12.5 <input type="checkbox"/> 4-6 <input type="checkbox"/> >12.5 <input checked="" type="checkbox"/> 6-8 Actual: _____	

☐ Contains TRI chemical above DeMinimus concentration. Actual concentration/range must be reported for each.

<b>Physical State</b> <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Sludge-Amount <input type="checkbox"/> Fused <input type="checkbox"/> Gas Other: _____	<b>Layers</b> <input checked="" type="checkbox"/> Single <input type="checkbox"/> Bi <input type="checkbox"/> Multi	<b>BTU/Pound (X1000)</b> <input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16 <input type="checkbox"/> 2-5 <input type="checkbox"/> >16 <input type="checkbox"/> 5-10 Actual _____	<b>Total Suspended Solids (% wt.)</b> <input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20 <input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20	<b>Viscosity</b> <input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
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App Date: <u>1/19/2011</u> Exp Date: <u>1/19/2012</u> Status: <u>Approved</u>	Price: <u>PINCIN1</u> \$189 /55 gal \$151 /30 gal \$113 /20 gal \$63 /5 gal
WasteCodes: <u>D001</u>	Comments: _____
Restricted <input checked="" type="checkbox"/>	Notes: _____
M Code <u>H061</u>	Special Precautions: _____
Handling Codes: <u>T50</u>	
Facility: <u>Essroc</u>	
EEI PSS#: _____	Equipment: <u>Full PPE</u>

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D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input checked="" type="checkbox"/> D001	Ignitable Liquids (f.p. <°F)		<input type="checkbox"/> D015 Toxaphene	>0.5 mg/l
<input type="checkbox"/>	Ignitable liquids		<input type="checkbox"/> D016 2,4-D	>10.0 mg/l
<input type="checkbox"/>	Oxidizers	<input type="checkbox"/> High TOC (>10%) NW	<input type="checkbox"/> D017 2,4,5-TP Silvex	>1.0 mg/l
<input type="checkbox"/>	Reactivities	<input type="checkbox"/> Low TOC (<10%) NWW	<input type="checkbox"/> D018 Benzene	>0.5 mg/l
<input type="checkbox"/>	Compressed Gases		<input type="checkbox"/> D019 Carbon Tetrachloride	>0.5 mg/l
<input type="checkbox"/> D002	Corrosive (pH<2 or >12.5)		<input type="checkbox"/> D020 Chlordane	>0.03 mg/l
<input type="checkbox"/>	Acid Liquids	<input type="checkbox"/> Alkaline Liquids	<input type="checkbox"/> D021 Chlorobenzene	>100.0 mg/l
<input type="checkbox"/>	Other Corrosive Liquids		<input type="checkbox"/> D022 Chloroform	>6.0 mg/l
<input type="checkbox"/> D003	Reactive		<input type="checkbox"/> D023 o-Cresol	>200.0 mg/l
<input type="checkbox"/>	Reactive Sulfides	<input type="checkbox"/> Reactive Cyanides	<input type="checkbox"/> D024 m-Cresol	>200.0 mg/l
<input type="checkbox"/>	Water Reactives	<input type="checkbox"/> Explosives	<input type="checkbox"/> D025 p-Cresol	>200.0 mg/l
<input type="checkbox"/>	Other Reactives		<input type="checkbox"/> D026 Cresol	>200.0 mg/l
<input type="checkbox"/> D004	Arsenic	>5.0 mg/l	<input type="checkbox"/> D027 1,4-Dichlorobenzene	>7.5 mg/l
<input type="checkbox"/> D005	Barium	>100.0 mg/l	<input type="checkbox"/> D028 1,2-Dichloroethane	>0.5 mg/l
<input type="checkbox"/> D006	Cadmium	>1.0 mg/l	<input type="checkbox"/> D029 1,1-Dichloroethylene	>0.7 mg/l
<input type="checkbox"/>	Cadmium Batteries		<input type="checkbox"/> D030 2,4-Dinitrotoluene	>0.13 mg/l
<input type="checkbox"/> D007	Chromium	>5.0 mg/l	<input type="checkbox"/> D031 Heptachlor( and its epoxide) >0.0008 mg/l	
<input type="checkbox"/> D008	Lead	>5.0 mg/l	<input type="checkbox"/> D032 Hexachlorobenzene	>0.13 mg/l
<input type="checkbox"/>	Lead Acid Batteries		<input type="checkbox"/> D033 Hexachlorobutadiene	>0.5 mg/l
<input type="checkbox"/> D009	Mercury	>0.2 mg/l	<input type="checkbox"/> D034 Hexachloroethane	>3.0 mg/l
<input type="checkbox"/>	High Mercury Organics (>260 mg/kg Total)		<input type="checkbox"/> D035 Methyl ethyl ketone	>200.0 mg/l
<input type="checkbox"/>	High Mercury Inorganics (>260 mg/kg Total)		<input type="checkbox"/> D036 Nitrobenzene	>2.0 mg/l
<input type="checkbox"/>	Incin. Residues		<input type="checkbox"/> D037 Pentachlorophenol	>100.0 mg/l
<input type="checkbox"/>	Low Mercury (<260 mg/kg Total)		<input type="checkbox"/> D038 Pyridine	>5.0 mg/l
<input type="checkbox"/> D010	Selenium	>1.0 mg/l	<input type="checkbox"/> D039 Tetrachloroethylene	>0.7 mg/l
<input type="checkbox"/> D011	Silver	>5.0 mg/l	<input type="checkbox"/> D040 Trichloroethylene	>0.5 mg/l
<input type="checkbox"/> D012	Endrin	>0.02 mg/l	<input type="checkbox"/> D041 2,4,5-Trichlorophenol	>400.0 mg/l
<input type="checkbox"/> D013	Lindane	>0.4 mg/l	<input type="checkbox"/> D042 2,4,6-Trichlorophenol	>2.0 mg/l
<input type="checkbox"/> D014	Methoxchlor	>10.0 mg/l	<input type="checkbox"/> D043 Vinyl Chloride	>0.2 mg/l

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☐ Yes (if "Yes" complete Question 2 below) ☒ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input type="checkbox"/> <100ppm <input checked="" type="checkbox"/> >100 ppm		Cyanide Total	<input checked="" type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input checked="" type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input checked="" type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input checked="" type="checkbox"/> <1% <input type="checkbox"/> >1%		Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions)

☐ does not meet any applicable standards

☐ treated to meet all applicable standards

☐ meets all applicable standards without treatment

☒ needs to be treated to meet certain treatment standards

☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above

2b. ☐ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land dispose

3. The above information was determined by:

☒ Generator's knowledge of the waste

☐ Laboratory analysis (attached)

#### Benzene NESHAP Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery ☐ Yes ☐ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHAP) ☐ Yes ☒ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 60012-80018 or my thorough knowledge of the waste.

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

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FOR EEI USE ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # X64220 (completed by EEI) Sales Code <u>KWISE</u>
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Customer Reference # _____				<b>(A) GENERAL INFORMATION</b>			
Generator Name <u>Environmental Enterprises Inc</u>		Billing Name <u>Environmental Enterprises Inc - ESD</u>		Contact Name <u>Brad Boyer</u>		Address <u>10163 Cincinnati-Dayton Rd</u>	
Contact Name <u>Harold James II</u>		City <u>Cincinnati</u>		State <u>OH</u>		Zip <u>45241-</u>	
Phone # <u>(513) 672-8154</u>		Fax # <u>(513) 672-8155</u>		USEPA ID# <u>OHD987048337</u>			

<b>(B) GENERAL WASTE INFORMATION</b>			
Name of Waste <u>Mercury Vac Waste</u>			
Process Generating <u>Clean Out of Mercury Vacuum</u>			
Anticipated Volume <u>1</u>	Units: <input checked="" type="checkbox"/> Drums <input type="checkbox"/> Gallons <input type="checkbox"/> Tons <input type="checkbox"/> Yards	Frequency: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input checked="" type="checkbox"/> Yearly <input type="checkbox"/> OneTime	
Size and Type of Container <u>5 Gallon Pail</u>			
DOT Shipping Name <u>Waste Mercury</u>			
Hazard Class <u>8</u>	UN/NA # <u>UN2809</u>	Packing Group <u>III</u>	
Special Handling or Precautions <u>Full PPE</u>		Sample Included? <input type="checkbox"/>	

<b>(C) RCRA CHARACTERISTICS</b>			
RCRA Waste Codes <u>D009</u>		F001-F005 Solvent Waste <input type="checkbox"/>	
Form Code <u>W002</u>		Waste is used in electroplating <input type="checkbox"/>	
Virgin Product <input type="checkbox"/>		Spill Cleanup <input type="checkbox"/>	
MSDS Attached <input type="checkbox"/>		Debris <input checked="" type="checkbox"/>	

<b>(D) CHEMICAL COMPOSITION</b>			<b>Is Waste</b>		<b>Odor</b>	<b>Color</b>
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.			Radioactive <input type="checkbox"/>		<input type="checkbox"/> None	Black
			Water Reactive <input type="checkbox"/>		<input checked="" type="checkbox"/> Mild	
			Oxidizer <input type="checkbox"/>		<input type="checkbox"/> Strong	
Constituent	Actual	Range	OSHA Carcinogen <input type="checkbox"/>		<b>% Water</b>	
Elemental Mercury	5%	%	Explosive <input type="checkbox"/>		<input type="checkbox"/> <5 <input type="checkbox"/> >20	
Sludge	80%	%	Pesticide <input type="checkbox"/>		<input type="checkbox"/> 5-10 Actual _____	
Liquid	20%	%	Polymerizable <input type="checkbox"/>		<input checked="" type="checkbox"/> 10-20	
Debris	5%	%	Organic Peroxide <input type="checkbox"/>		<b>% Halogens</b>	
			Infectious <input type="checkbox"/>		<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 10-20	
			Pyrophoric <input type="checkbox"/>		<input type="checkbox"/> 1-5 <input type="checkbox"/> >20	
			(a blank box indicates "No")		<input type="checkbox"/> 5-10 Actual _____	
			<b>Flash Point F°</b>		<b>pH</b>	
			(closed cup)		<input type="checkbox"/> <2 <input type="checkbox"/> 8-10	
			<input type="checkbox"/> <100 <input checked="" type="checkbox"/> >200		<input type="checkbox"/> 2-4 <input type="checkbox"/> 10-12.5	
			Actual _____		<input type="checkbox"/> 4-6 <input type="checkbox"/> >12.5	
			<input type="checkbox"/> 100-140		Actual: _____	
			<input type="checkbox"/> 140-200			

☐ Contains TRI chemical above DeMinimus concentration. Actual concentration/range must be reported for each.

<b>Physical State</b>		<b>Layers</b>	<b>BTU/Pound (X1000)</b>	<b>Total Suspended Solids (% wt.)</b>	<b>Viscosity</b>
<input checked="" type="checkbox"/> Solid	<input checked="" type="checkbox"/> Liquid	<input checked="" type="checkbox"/> Single	<input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16	<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20	<input type="checkbox"/> Low
<input type="checkbox"/> Powder	<input type="checkbox"/> Sludge-Amount	<input type="checkbox"/> Bi	<input type="checkbox"/> 2-5 <input type="checkbox"/> >16	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20	<input checked="" type="checkbox"/> Medium
<input type="checkbox"/> Fused	<input type="checkbox"/> Gas	<input type="checkbox"/> Multi	<input type="checkbox"/> 5-10 Actual _____		<input type="checkbox"/> High
Other: _____					

App Date: 6/30/2004 Exp Date: 8/16/2009 Status: Recertified Price: merc3 \$1470 /55 gal \$1103 /30 gal \$882 /20 gal \$263 /5 gal

WasteCodes: D009

Restricted ☒

M Code H141

Handling Codes: S01 HG

Facility: Clean Harbors

EEI PSS#: \_\_\_\_\_

Comments: \_\_\_\_\_

Notes: \_\_\_\_\_

Special Precautions: \_\_\_\_\_

Equipment: Full PPE



D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input type="checkbox"/> D001	Ignitable Liquids (f.p. <°F)		<input type="checkbox"/> D015	Toxaphene >0.5 mg/l
<input type="checkbox"/>	Ignitable liquids		<input type="checkbox"/> D016	2,4-D >10.0 mg/l
<input type="checkbox"/>	Oxidizers		<input type="checkbox"/> D017	2,4,5-TP Silvex >1.0 mg/l
<input type="checkbox"/>	Reactives		<input type="checkbox"/> D018	Benzene >0.5 mg/l
<input type="checkbox"/>	Compressed Gases		<input type="checkbox"/> D019	Carbon Tetrachloride >0.5 mg/l
<input type="checkbox"/> D002	Corrosive (pH<2 or >12.5)		<input type="checkbox"/> D020	Chlordane >0.03 mg/l
<input type="checkbox"/>	Acid Liquids		<input type="checkbox"/> D021	Chlorobenzene >100.0 mg/l
<input type="checkbox"/>	Other Corrosive Liquids		<input type="checkbox"/> D022	Chloroform >6.0 mg/l
<input type="checkbox"/> D003	Reactive		<input type="checkbox"/> D023	o-Cresol >200.0 mg/l
<input type="checkbox"/>	Reactive Sulfides		<input type="checkbox"/> D024	m-Cresol >200.0 mg/l
<input type="checkbox"/>	Water Reactives		<input type="checkbox"/> D025	p-Cresol >200.0 mg/l
<input type="checkbox"/>	Other Reactives		<input type="checkbox"/> D026	Cresol >200.0 mg/l
<input type="checkbox"/> D004	Arsenic >5.0 mg/l		<input type="checkbox"/> D027	1,4-Dichlorobenzene >7.5 mg/l
<input type="checkbox"/> D005	Barium >100.0 mg/l		<input type="checkbox"/> D028	1,2-Dichloroethane >0.5 mg/l
<input type="checkbox"/> D006	Cadmium >1.0 mg/l		<input type="checkbox"/> D029	1,1-Dichloroethylene >0.7 mg/l
<input type="checkbox"/>	Cadmium Batteries		<input type="checkbox"/> D030	2,4-Dinitrotoluene >0.13 mg/l
<input type="checkbox"/> D007	Chromium >5.0 mg/l		<input type="checkbox"/> D031	Heptachlor(and its epoxide)>0.008 mg/l
<input type="checkbox"/> D008	Lead >5.0 mg/l		<input type="checkbox"/> D032	Hexachlorobenzene >0.13 mg/l
<input type="checkbox"/>	Lead Acid Batteries		<input type="checkbox"/> D033	Hexachlorobutadiene >0.5 mg/l
<input checked="" type="checkbox"/> D009	Mercury >0.2 mg/l		<input type="checkbox"/> D034	Hexachloroethane >3.0 mg/l
<input type="checkbox"/>	High Mercury Organics (>260 mg/kg Total)		<input type="checkbox"/> D035	Methyl ethyl ketone >200.0 mg/l
<input checked="" type="checkbox"/>	High Mercury Inorganics (>260 mg/kg Total)		<input type="checkbox"/> D036	Nitrobenzene >2.0 mg/l
<input type="checkbox"/>	Incin. Residues		<input type="checkbox"/> D037	Pentachlorophenol >100.0 mg/l
<input type="checkbox"/>	Low Mercury (<260 mg/kg Total)		<input type="checkbox"/> D038	Pyridine >5.0 mg/l
<input type="checkbox"/> D010	Selenium >1.0 mg/l		<input type="checkbox"/> D039	Tetrachloroethylene >0.7 mg/l
<input type="checkbox"/> D011	Silver >5.0 mg/l		<input type="checkbox"/> D040	Trichloroethylene >0.5 mg/l
<input type="checkbox"/> D012	Endrin >0.02 mg/l		<input type="checkbox"/> D041	2,4,5-Trichlorophenol >400.0 mg/l
<input type="checkbox"/> D013	Lindane >0.4 mg/l		<input type="checkbox"/> D042	2,4,6-Trichlorophenol >2.0 mg/l
<input type="checkbox"/> D014	Methoxchlor >10.0 mg/l		<input type="checkbox"/> D043	Vinyl Chloride >0.2 mg/l

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☒ Yes (if "Yes" complete Question 2 below) ☐ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input checked="" type="checkbox"/> <100ppm <input type="checkbox"/> >100 ppm		Cyanide Total	<input checked="" type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input checked="" type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input checked="" type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input checked="" type="checkbox"/> <1% <input type="checkbox"/> >1%		Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions)

- ☐ does not meet any applicable standards  
☐ treated to meet all applicable standards  
☐ meets all applicable standards without treatment  
☒ needs to be treated to meet certain treatment standards  
☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS.

Mercury

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above.

2b. ☒ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land disposed.

3. The above information was determined by:

- ☒ Generator's knowledge of the waste  
☐ Laboratory analysis (attached)

#### Benzene NESHA Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery?

☐ Yes ☒ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHA)?

☐ Yes ☒ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 600/2-80018 or my thorough knowledge of the waste.

C-10





<b>FOR EEI USE</b> ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # X35373 (completed by EEI) Sales Code <b>KWISE</b>
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Customer Reference # _____				<b>(A) GENERAL INFORMATION</b>			
Generator Name <b>Environmental Enterprises Inc</b>				Billing Name <b>Environmental Enterprises Inc - ESD</b>			
Contact Name <b>Harold James II</b>				Contact Name <b>Brad Boyer</b>			
Address <b>10163 Cincinnati-Dayton Rd.</b>				Address <b>10163 Cincinnati-Dayton Road</b>			
City <b>Cincinnati</b>				City <b>Cincinnati</b>			
State <b>OH</b>		Zip <b>45241-</b>		State <b>OH</b>		Zip <b>45241-</b>	
Phone # <b>(513) 672-8154</b>				Phone # <b>(513) 772-2818</b>			
Fax # <b>(513) 672-8155</b>				Fax # _____			
USEPA ID# <b>OHD987048337</b>							

<b>(B) GENERAL WASTE INFORMATION</b>			
Name of Waste <b>Liquids, Varied</b>			
Process Generating <b>Clean Out</b>			
Anticipated Volume <b>10-11</b>	Units: <input checked="" type="checkbox"/> Drums <input type="checkbox"/> Gallons <input type="checkbox"/> Tons <input type="checkbox"/> Yards	Frequency: <input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Yearly <input type="checkbox"/> OneTime	
Size and Type of Container <b>55 Gallon Metal Drum</b>			
DOT Shipping Name <b>Waste Flammable liquids, n.o.s.</b>			
Hazard Class <b>3</b>	UN/NA # <b>UN1993</b>	Packing Group <b>II</b>	
Special Handling or Precautions _____		Sample Included? <input type="checkbox"/>	

<b>(C) RCRA CHARACTERISTICS</b>			
RCRA Waste Codes <b>D001 D022 D035 F002 F003 F005</b>		F001-F005 Solvent Waste <input type="checkbox"/>	
Form Code <b>W609</b>		Waste is used in electroplating <input type="checkbox"/>	
Virgin Product <input type="checkbox"/>		Spill Cleanup <input type="checkbox"/>	
MSDS Attached <input type="checkbox"/>		Debris <input type="checkbox"/>	

<b>(D) CHEMICAL COMPOSITION</b>			<b>Is Waste</b>		<b>Odor</b>	<b>Color</b>
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.					<input type="checkbox"/> None	varies
					<input checked="" type="checkbox"/> Mild	
					<input type="checkbox"/> Strong	
<b>Constituent</b>	<b>Actual</b>	<b>Range</b>			<b>% Water</b>	
Mixed Liquids/Sludge	60%	%			<input type="checkbox"/> <5 <input checked="" type="checkbox"/> >20	
Water	40%	%			Actual _____	
					<b>% Halogens</b>	
					<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 10-20	
					<input type="checkbox"/> 1-5 <input type="checkbox"/> >20	
					Actual _____	
					<b>pH</b>	
					<input type="checkbox"/> <2 <input type="checkbox"/> 8-10	
					<input type="checkbox"/> 2-4 <input type="checkbox"/> 10-12.5	
					<input type="checkbox"/> 4-6 <input type="checkbox"/> >12.5	
					Actual: <b>7</b>	
			<b>Flash Point F°</b> (closed cup)			
			<input type="checkbox"/> <100 <input type="checkbox"/> >200			
			<input checked="" type="checkbox"/> 100-140 Actual _____			
			<input type="checkbox"/> 140-200			

☐ Contains TRI chemical above DeMinimus concentration. Actual concentration/range must be reported for each.

<b>Physical State</b> <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Sludge-Amount <input type="checkbox"/> Fused <input type="checkbox"/> Gas Other: _____	<b>Layers</b> <input type="checkbox"/> Single <input checked="" type="checkbox"/> Bi <input type="checkbox"/> Multi	<b>BTU/Pound (X1000)</b> <input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16 <input type="checkbox"/> 2-5 <input type="checkbox"/> >16 <input type="checkbox"/> 5-10 Actual 1999	<b>Total Suspended Solids (% wt.)</b> <input type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20 <input type="checkbox"/> 1-5 <input checked="" type="checkbox"/> 10-20	<b>Viscosity</b> <input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High
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App Date: <b>5/29/2001</b> Exp Date: <b>4/14/2009</b> Status: <b>Recertified</b>	Price: <b>S_INCIN1</b> No Charge
Waste Codes: <b>Varies</b>	No Charge
Restricted <input checked="" type="checkbox"/>	Comments: <b>Clean Out of T16 MRS Load</b>
M Code <b>H061</b>	Notes: _____
Handling Codes: <b>T50 INCIN</b>	Special Precautions: _____
Facility: <b>MRS/Essroc</b>	
EEI PSS#: _____	Equipment: <b>Full PPE</b>

C-11



D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input checked="" type="checkbox"/> D001	Ignitable Liquids (f.p. <131°F)		<input type="checkbox"/> D015	Toxaphene >0.5 mg/l
<input type="checkbox"/>	Ignitable liquids		<input type="checkbox"/> D016	2,4-D >10.0 mg/l
<input type="checkbox"/>	Oxidizers		<input type="checkbox"/> D017	2,4,5-TP Silvex >1.0 mg/l
<input type="checkbox"/>	Reactive		<input checked="" type="checkbox"/> D018	Benzene >0.5 mg/l
<input type="checkbox"/>	Compressed Gases		<input checked="" type="checkbox"/> D019	Carbon Tetrachloride >0.5 mg/l
<input type="checkbox"/> D002	Corrosive (pH<2 or >12.5)		<input type="checkbox"/> D020	Chlordane >0.03 mg/l
<input type="checkbox"/>	Acid Liquids		<input type="checkbox"/> D021	Chlorobenzene >100.0 mg/l
<input type="checkbox"/>	Other Corrosive Liquids		<input checked="" type="checkbox"/> D022	Chloroform >6.0 mg/l
<input type="checkbox"/> D003	Reactive		<input type="checkbox"/> D023	o-Cresol >200.0 mg/l
<input type="checkbox"/>	Reactive Sulfides		<input type="checkbox"/> D024	m-Cresol >200.0 mg/l
<input type="checkbox"/>	Water Reactives		<input type="checkbox"/> D025	p-Cresol >200.0 mg/l
<input type="checkbox"/>	Other Reactives		<input type="checkbox"/> D026	Cresol >200.0 mg/l
<input checked="" type="checkbox"/> D004	Arsenic >5.0 mg/l		<input type="checkbox"/> D027	1,4-Dichlorobenzene >7.5 mg/l
<input type="checkbox"/> D005	Barium >100.0 mg/l		<input type="checkbox"/> D028	1,2-Dichloroethane >0.5 mg/l
<input checked="" type="checkbox"/> D006	Cadmium >1.0 mg/l		<input type="checkbox"/> D029	1,1-Dichloroethylene >0.7 mg/l
<input type="checkbox"/>	Cadmium Batteries		<input type="checkbox"/> D030	2,4-Dinitrotoluene >0.13 mg/l
<input checked="" type="checkbox"/> D007	Chromium >5.0 mg/l		<input type="checkbox"/> D031	Heptachlor(and its epoxide) >0.0008 mg/l
<input type="checkbox"/> D008	Lead >5.0 mg/l		<input type="checkbox"/> D032	Hexachlorobenzene >0.13 mg/l
<input type="checkbox"/>	Lead Acid Batteries		<input type="checkbox"/> D033	Hexachlorobutadiene >0.5 mg/l
<input checked="" type="checkbox"/> D009	Mercury >0.2 mg/l		<input type="checkbox"/> D034	Hexachloroethane >3.0 mg/l
<input type="checkbox"/>	High Mercury Organics (>260 mg/kg Total)		<input type="checkbox"/> D035	Methyl ethyl ketone >200.0 mg/l
<input type="checkbox"/>	High Mercury Inorganics (>260 mg/kg Total)		<input type="checkbox"/> D036	Nitrobenzene >2.0 mg/l
<input type="checkbox"/>	Inciner. Residues		<input type="checkbox"/> D037	Pentachlorophenol >100.0 mg/l
<input type="checkbox"/>	Low Mercury (<260 mg/kg Total)		<input checked="" type="checkbox"/> D038	Pyridine >5.0 mg/l
<input checked="" type="checkbox"/> D010	Selenium >1.0 mg/l		<input checked="" type="checkbox"/> D039	Tetrachloroethylene >0.7 mg/l
<input checked="" type="checkbox"/> D011	Silver >5.0 mg/l		<input type="checkbox"/> D040	Trichloroethylene >0.5 mg/l
<input type="checkbox"/> D012	Endrin >0.02 mg/l		<input type="checkbox"/> D041	2,4,5-Trichlorophenol >400.0 mg/l
<input type="checkbox"/> D013	Lindane >0.4 mg/l		<input type="checkbox"/> D042	2,4,6-Trichlorophenol >2.0 mg/l
<input type="checkbox"/> D014	Methoxychlor >10.0 mg/l		<input type="checkbox"/> D043	Vinyl Chloride >0.2 mg/l

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☒ Yes (if "Yes" complete Question 2 below) ☐ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input type="checkbox"/> <100ppm <input type="checkbox"/> >100 ppm		Cyanide Total	<input checked="" type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input checked="" type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input type="checkbox"/> <1% <input checked="" type="checkbox"/> >1%		Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions)

☐ does not meet any applicable standards

☐ treated to meet all applicable standards

☐ meets all applicable standards without treatment

☒ needs to be treated to meet certain treatment standards

☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS

Arsenic, Cadmium, Chrome, Selenium, Silver, Benzene, Carbon Tetrachloride, Chloroform, Pyridine, Tetrachloroethylene

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above

2b. ☒ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land dispose

3. The above information was determined by:

☒ Generator's knowledge of the waste

☐ Laboratory analysis (attached)

#### Benzene NESHA Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery? ☐ Yes ☐ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHA)? ☐ Yes ☐ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 600/12-80018 or my thorough knowledge of the waste.

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

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FOR EEI USE ABS _____ Profile Log _____ Entered by _____ Date _____	<b>ENVIRONMENTAL ENTERPRISES, INC.</b> <b>CONFIDENTIAL WASTE PROFILE</b> Page 1 of 2	EEI's Approval # X35374 (completed by EEI) Sales Code <u>KWISE</u>
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<b>(A) GENERAL INFORMATION</b>			
Customer Reference # _____		Billing Name <u>Environmental Enterprises Inc - ESD</u>	
Generator Name <u>Environmental Enterprises Inc</u>		Contact Name <u>Brad Boyer</u>	
Contact Name <u>Harold James II</u>		Address <u>10163 Cincinnati-Dayton Rd</u>	
Address <u>10163 Cincinnati-Dayton Rd.</u>		City <u>Cincinnati</u>	
City <u>Cincinnati</u>		State <u>OH</u> Zip <u>45241-</u>	
State <u>OH</u> Zip <u>45241-</u>		Phone # <u>(513) 672-8154</u>	
Phone # <u>(513) 672-8154</u>		Fax # _____	
Fax # <u>(513) 672-8155</u>		USEPA ID# <u>OHD987048337</u>	

<b>(B) GENERAL WASTE INFORMATION</b>			
Name of Waste <u>Mixed Solvent Sludge</u>			
Process Generating _____			
Anticipated Volume _____	Units: <input type="checkbox"/> Drums <input type="checkbox"/> Gallons <input type="checkbox"/> Tons <input type="checkbox"/> Yards	Frequency: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Yearly <input checked="" type="checkbox"/> One Time	
Size and Type of Container _____			
DOT Shipping Name <u>Waste Flammable liquids, n.o.s.</u>			
Hazard Class <u>3</u>	UN/NA # <u>UN1993</u>	Packing Group <u>II</u>	
Special Handling or Precautions _____		Sample Included? <input type="checkbox"/>	

<b>(C) RCRA CHARACTERISTICS</b>			
RCRA Waste Codes <u>D004 D006 D007 D008 D009 D010 D011 D018 D022</u>		F001-F005 Solvent Waste <input type="checkbox"/>	
Form Code <u>D009</u>		Waste is used in electroplating <input type="checkbox"/>	
Virgin Product <input type="checkbox"/>	MSDS Attached <input type="checkbox"/>	Spill Cleanup <input type="checkbox"/>	Debris <input type="checkbox"/>

<b>(D) CHEMICAL COMPOSITION</b>			<b>Is Waste</b>		<b>Odor</b>	<b>Color</b>
(If actual percentages are not known, use ranges.) Total should be at least 100%. All constituents, including debris, must be specifically identified.			Radioactive <input type="checkbox"/>		<input type="checkbox"/> None	varies _____
			Water Reactive <input type="checkbox"/>		<input checked="" type="checkbox"/> Mild	
			Oxidizer <input type="checkbox"/>		<input type="checkbox"/> Strong	
			OSHA Carcinogen <input type="checkbox"/>		<b>% Water</b>	
			Explosive <input type="checkbox"/>		<input type="checkbox"/> <5 <input type="checkbox"/> >20	
			Pesticide <input type="checkbox"/>		<input type="checkbox"/> 5-10 Actual _____	
			Polymerizable <input type="checkbox"/>		<input type="checkbox"/> 10-20	
			Organic Peroxide <input type="checkbox"/>		<b>% Halogens</b>	
			Infectious <input type="checkbox"/>		<input type="checkbox"/> <1 <input type="checkbox"/> 10-20	
			Pyrophoric <input type="checkbox"/>		<input type="checkbox"/> 1-5 <input type="checkbox"/> >20	
			( a blank box indicates "No")		<input type="checkbox"/> 5-10 Actual _____	
			<b>Flash Point F°</b>		<b>pH</b>	
			(closed cup)		<input type="checkbox"/> <2 <input type="checkbox"/> 8-10	
			<input type="checkbox"/> <100 <input type="checkbox"/> >200		<input type="checkbox"/> 2-4 <input type="checkbox"/> 10-12.5	
			<input checked="" type="checkbox"/> 100-140 Actual _____		<input type="checkbox"/> 4-6 <input type="checkbox"/> >12.5	
			<input type="checkbox"/> 140-200		<input checked="" type="checkbox"/> 6-8 Actual: <u>7</u>	

<b>Physical State</b>		<b>Layers</b>	<b>BTU/Pound (X1000)</b>	<b>Total Suspended Solids (% wt.)</b>	<b>Viscosity</b>
<input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid	<input type="checkbox"/> Powder <input type="checkbox"/> Sludge-Amount	<input type="checkbox"/> Single <input checked="" type="checkbox"/> Bi <input type="checkbox"/> Multi	<input checked="" type="checkbox"/> <2 <input type="checkbox"/> 10-16	<input type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input checked="" type="checkbox"/> >20	<input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High
<input type="checkbox"/> Fused <input type="checkbox"/> Gas			<input type="checkbox"/> 2-5 <input type="checkbox"/> >16	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20	
Other: _____			<input type="checkbox"/> 5-10 Actual 1999		

App Date: <u>5/21/2001</u> Exp Date: <u>5/21/2002</u> Status: <u>Archived</u>	Price: <u>SPEC1</u> No Charge
WasteCodes: _____	No Charge
Restricted <input checked="" type="checkbox"/>	Comments: <u>Last received 7/02</u>
M Code <u>H141</u>	Notes: _____
Handling Codes: <u>S01</u>	Special Precautions: _____
Facility: <u>FISHR</u>	
EEI PSS#: _____	Equipment: _____

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D-Code Characteristic Waste (a blank box indicates N/A)		Actual Range	(continuation)	Actual Range
<input type="checkbox"/> D001	Ignitable Liquids (f.p. <°F)		<input type="checkbox"/> D015	Toxaphene >0.5 mg/l
<input type="checkbox"/>	Ignitable liquids		<input type="checkbox"/> D016	2,4-D >10.0 mg/l
<input type="checkbox"/>	Oxidizers	<input type="checkbox"/> High TOC (>10%) NW	<input type="checkbox"/> D017	2,4,5-TP Silvex >1.0 mg/l
<input type="checkbox"/>	Reactives	<input type="checkbox"/> Low TOC (<10%) NWW	<input checked="" type="checkbox"/> D018	Benzene >0.5 mg/l
<input type="checkbox"/>	Compressed Gases		<input type="checkbox"/> D019	Carbon Tetrachloride >0.5 mg/l
<input type="checkbox"/> D002	Corrosive (pH<2 or >12.5)		<input type="checkbox"/> D020	Chlordane >0.03 mg/l
<input type="checkbox"/>	Acid Liquids	<input type="checkbox"/> Alkaline Liquids	<input type="checkbox"/> D021	Chlorobenzene >100.0 mg/l
<input type="checkbox"/>	Other Corrosive Liquids		<input checked="" type="checkbox"/> D022	Chloroform >6.0 mg/l
<input type="checkbox"/> D003	Reactive		<input type="checkbox"/> D023	o-Cresol >200.0 mg/l
<input type="checkbox"/>	Reactive Sulfides	<input type="checkbox"/> Reactive Cyanides	<input type="checkbox"/> D024	m-Cresol >200.0 mg/l
<input type="checkbox"/>	Water Reactives	<input type="checkbox"/> Explosives	<input type="checkbox"/> D025	p-Cresol >200.0 mg/l
<input type="checkbox"/>	Other Reactives		<input type="checkbox"/> D026	Cresol >200.0 mg/l
<input checked="" type="checkbox"/> D004	Arsenic >5.0 mg/l		<input type="checkbox"/> D027	1,4-Dichlorobenzene >7.5 mg/l
<input type="checkbox"/> D005	Barium >100.0 mg/l		<input type="checkbox"/> D028	1,2-Dichloroethane >0.5 mg/l
<input checked="" type="checkbox"/> D006	Cadmium >1.0 mg/l		<input type="checkbox"/> D029	1,1-Dichloroethylene >0.7 mg/l
<input type="checkbox"/>	Cadmium Batteries		<input type="checkbox"/> D030	2,4-Dinitrotoluene >0.13 mg/l
<input checked="" type="checkbox"/> D007	Chromium >5.0 mg/l		<input type="checkbox"/> D031	Heptachlor(and its epoxide) >0.0008 mg/l
<input checked="" type="checkbox"/> D008	Lead >5.0 mg/l		<input type="checkbox"/> D032	Hexachlorobenzene >0.13 mg/l
<input type="checkbox"/>	Lead Acid Batteries		<input type="checkbox"/> D033	Hexachlorobutadiene >0.5 mg/l
<input checked="" type="checkbox"/> D009	Mercury >0.2 mg/l		<input type="checkbox"/> D034	Hexachloroethane >3.0 mg/l
<input type="checkbox"/>	High Mercury Organics (>260 mg/kg Total)		<input type="checkbox"/> D035	Methyl ethyl ketone >200.0 mg/l
<input type="checkbox"/>	High Mercury Inorganics (>260 mg/kg Total)		<input type="checkbox"/> D036	Nitrobenzene >2.0 mg/l
<input type="checkbox"/>	Incin. Residues		<input type="checkbox"/> D037	Pentachlorophenol >100.0 mg/l
<input type="checkbox"/>	Low Mercury (<260 mg/kg Total)		<input type="checkbox"/> D038	Pyridine >5.0 mg/l
<input checked="" type="checkbox"/> D010	Selenium >1.0 mg/l		<input checked="" type="checkbox"/> D039	Tetrachloroethylene >0.7 mg/l
<input checked="" type="checkbox"/> D011	Silver >5.0 mg/l		<input type="checkbox"/> D040	Trichloroethylene >0.5 mg/l
<input type="checkbox"/> D012	Endrin >0.02 mg/l		<input type="checkbox"/> D041	2,4,5-Trichlorophenol >400.0 mg/l
<input type="checkbox"/> D013	Lindane >0.4 mg/l		<input type="checkbox"/> D042	2,4,6-Trichlorophenol >2.0 mg/l
<input type="checkbox"/> D014	Methoxchlor >10.0 mg/l		<input type="checkbox"/> D043	Vinyl Chloride >0.2 mg/l

If waste is D001-D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☐ Yes (if "Yes" complete Question 2 below) ☐ No (if "No" complete Question 3 below)

Other Metals	Actual Range	Other Organic Constituents	Actual Range	Other Organic Constituents	None	>ppm	Actual
<input type="checkbox"/> Copper		VOCs <input type="checkbox"/> <100ppm <input type="checkbox"/> >100 ppm		Cyanide Total	<input type="checkbox"/>	<input type="checkbox"/> >250	
<input type="checkbox"/> Nickel		*PCB <input type="checkbox"/> 0 <input type="checkbox"/> <50 <input type="checkbox"/> 50-500 <input type="checkbox"/> >500		Cyanide Amendable	<input type="checkbox"/>	<input type="checkbox"/> >30	
<input type="checkbox"/> Thallium		TOC <input type="checkbox"/> <1% <input type="checkbox"/> >1%		Sulfides	<input type="checkbox"/>	<input type="checkbox"/> >500	
<input type="checkbox"/> Zinc							

\*PCB Regulated by 40 CFR Part 761? ☐ Yes ☐ No If "Yes," material must be profiled on a confidential waste profile.

#### Federal Land Disposal Restrictions and Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete Questions

☐ does not meet any applicable standards

☐ treated to meet all applicable standards

☐ meets all applicable standards without treatment

☐ needs to be treated to meet certain treatment standards

☐ no federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 286.48 Table UTS

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above

2b. ☐ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land dispose

3. The above information was determined by:

☐ Generator's knowledge of the waste

☐ Laboratory analysis (attached)

#### Benzene NESHAP Determination

Is the waste generated by a chemical manufacturing plant, coke by-product recovery plant, or a petroleum refinery ☐ Yes ☐ No

Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHAP) ☐ Yes ☐ No

#### Infectious Waste Certification

If the waste is biological, I certify that it is not infectious \_\_\_\_\_ initial

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 600/12-80018 or my thorough knowledge of the waste.

Signature \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

C-14





**Environmental Enterprises Inc - EPA ID:OHD987048337**

10163 Cincinnati-Dayton Rd.

Cincinnati OH 45241

<i>Profile #</i>	<i>Date In</i>	<i>Ticket #</i>	<i>RCRA Codes</i>	<i>Amount</i>	<i>Units</i>	<i>H Code</i>	<i>W Code</i>	<i>Manifest #</i>
<b>Q1714</b>	<b>Aerosols</b>							
	1/28/2010	10-01755	D001	10	P	H050	W801	1997929FLE
			<i>Total For This Profile:</i>	10	P			
<b>Q1715</b>	<b>Grill Propane</b>							
	1/28/2010	10-01757	D001	100	P	H050	W801	1997929FLE
			<i>Total For This Profile:</i>	100	P			
<b>Q1716</b>	<b>Paint (Petroleum Distillates)</b>							
	1/28/2010	10-01758	D001	50	P	H141	W209	1997929FLE
			<i>Total For This Profile:</i>	50	P			
<b>Q1745</b>	<b>Shockwave Disinfectant (Alkyl Dimethyl Benzyl Ammonium Chlori</b>							
	1/28/2010	10-01759	D002	9	P	H121	W110	1997929FLE
			<i>Total For This Profile:</i>	9	P			
<b>Q1747</b>	<b>Small Propane Cylinders</b>							
	1/28/2010	10-01756	D001	5	P	H050	W801	1997929FLE
			<i>Total For This Profile:</i>	5	P			
<b>Q3020</b>	<b>Tanker Sludge</b>							
	9/27/2010	10-81514	D002,D007,008	400	P	H111	W103	2504733FLE
	9/27/2010	10-81511	D002,D007,008	400	P	H111	W103	2504733FLE
	9/27/2010	10-81513	D002,D007,008	400	P	H111	W103	2504733FLE
	9/27/2010	10-81512	D002,D007,008	400	P	H111	W103	2504733FLE
	9/27/2010	10-81515	D002,D007,008	400	P	H111	W103	2504733FLE
			<i>Total For This Profile:</i>	2000	P			
<b>X35373</b>	<b>Liquids, Varied</b>							
	1/26/2010	10-01501	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01502	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01507	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01504	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01506	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01505	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	1/26/2010	10-01503	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997898FLE
	3/30/2010	10-07334	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1995880FLE
	3/30/2010	10-07339	D001	450	P	H061	W609	1995883FLE
	3/30/2010	10-07336	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1995880FLE
	3/30/2010	10-07338	D001	450	P	H061	W609	1995883FLE
	3/30/2010	10-07333	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1995880FLE
	3/30/2010	10-07335	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1995880FLE
	3/30/2010	10-07337	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1995880FLE
	7/13/2010	10-79430	D001,D004,D005,D007,D008,D009, D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE
	7/13/2010	10-79424	D001,D004,D005,D007,D008,D009, D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE

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7/13/2010	10-79429	D001,D004,D005,D007,D008,D009 ,D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE
7/13/2010	10-79428	D001,D004,D005,D007,D008,D009 ,D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE
7/13/2010	10-79427	D001,D004,D005,D007,D008,D009 ,D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE
7/13/2010	10-79425	D001,D004,D005,D007,D008,D009 ,D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE
7/13/2010	10-79426	D001,D004,D005,D007,D008,D009 ,D011,D018,D022,D027,D035,D03 9,F002,F003,F005,P022,P105,U05 2,U404	600	P	H061	W609	1995991FLE

**Total For This Profile:**

10500 P

**X64220**

**Mercury Vac Waste**

5/20/2010	10-13391	D009	20	P	H141	W002	1995967FLE
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**Total For This Profile:**

20 P

**X77083**

**Basic Corrosives**

1/28/2010	10-01752	D007,D008	450	P	H111	W110	1997938FLE
1/28/2010	10-01754	D002,D007,D008	450	P	H121	W110	1997938FLE
1/28/2010	10-01753	D002,D007,D008	450	P	H121	W110	1997938FLE

**Total For This Profile:**

1350 P

**Hazardous Inventory Received  
Calendar Year 2010**

**Environmental Enterprises Inc  
4650 Spring Grove Avenue  
Cincinnati, OH 45232  
Voice: 513-541-1823  
Fax: 513-541-1638  
EPA ID: OHD083377010**

**Thursday, January 27, 2011**



**Environmental Enterprises Inc - EPA ID:OHD987048337**

10163 Cincinnati-Dayton Rd.

Cincinnati OH 45241

<i>Profile #</i>	<i>Date In</i>	<i>Ticket #</i>	<i>RCRA Codes</i>	<i>Amount</i>	<i>Units</i>	<i>H Code</i>	<i>W Code</i>	<i>Manifest #</i>
<b>Q1714</b>	<b>Aerosols</b>							
	1/26/2011	11-04066	D001	2	P	H141	W801	2504894FLE
	<b>Total For This Profile:</b>			2	P			
<b>Q1716</b>	<b>Paint (Petroleum Distillates)</b>							
	1/26/2011	11-04067	D001	18	P	H061	W209	2504894FLE
	<b>Total For This Profile:</b>			18	P			
<b>Q3020</b>	<b>Tanker Sludge</b>							
	4/13/2011	11-76067	D002,D007,D008	450	P	H111	W110	2778452FLE
	4/13/2011	11-76066	D002,D007,D008	450	P	H111	W110	2778452
	5/19/2011	11-21879	D002,D007,D008	450	P	H111	W110	2778609FLE
	5/19/2011	11-21881	D002,D007,D008	450	P	H121	W110	2778609FLE
	5/19/2011	11-21880	D002,D007,D008	600	P	H111	W110	2778609FLE
	5/19/2011	11-21882	D002,D007,D008	450	P	H111	W110	2778609FLE
	5/19/2011	11-21878	D002,D007,D008	450	P	H111	W110	2778609FLE
	10/3/2011	11-48363	D002,D007,D008	450	P	H121	W110	2778855FLE
	10/3/2011	11-48364	D002,D007,D008	450	P	H121	W110	2778855FLE
	<b>Total For This Profile:</b>			4200	P			
<b>Q3672</b>	<b>Bio-Diesel</b>							
	1/26/2011	11-04076	D001	450	P	H061	W203	2778314FLE
	1/26/2011	11-04077	D001	450	P	H061	W203	2778314FLE
	1/26/2011	11-04078	D001	450	P	H061	W203	2778314FLE
	<b>Total For This Profile:</b>			1350	P			
<b>Q3673</b>	<b>Sodium Hydroxide, GardoClean</b>							
	1/26/2011	11-04075	D002,D007	450	P	H121	W110	2778313FLE
	<b>Total For This Profile:</b>			450	P			
<b>X35373</b>	<b>Liquids, Varied</b>							
	1/26/2011	11-04072	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	1/26/2011	11-04071	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	1/26/2011	11-04069	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	1/26/2011	11-04070	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	1/26/2011	11-04074	D001,D022,D035,F002,F003,F005	450	P	H141	W609	2778304FLE
	1/26/2011	11-04068	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	1/26/2011	11-04073	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778304FLE
	3/22/2011	11-12560	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	3/22/2011	11-12556	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	3/22/2011	11-12557	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	3/22/2011	11-12558	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	3/22/2011	11-12559	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	3/22/2011	11-12555	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778407FLE
	10/3/2011	11-48353	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
	10/3/2011	11-48361	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
	10/3/2011	11-48358	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
	10/3/2011	11-48355	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
	10/3/2011	11-48354	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
	10/3/2011	11-48359	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE

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10/3/2011	11-48360	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48362	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48352	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48349	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48351	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48350	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48357	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE
10/3/2011	11-48356	D001,D022,D035,F002,F003,F005	450	P	H061	W609	2778855FLE

**Total For This Profile:**

12150 P

**X79719**

**Chrome Water**

4/13/2011	11-76068	D006,D007,D008,D009	135	P	H141	W113	2778452FLE
5/19/2011	11-21883	D006,D007,D008,D009	135	P	H121	W113	2778609FLE

**Total For This Profile:**

270 P

**Hazardous Inventory Received  
Calendar Year 2011**

**Tuesday, February 14, 2012**

**Environmental Enterprises Inc**  
**4650 Spring Grove Avenue**  
**Cincinnati, OH 45232**  
**Voice: 513-541-1823**  
**Fax: 513-541-1638**  
**EPA ID: OHD083377010**



**Environmental Enterprises Inc - EPA ID:OHD987048337**

10163 Cincinnati-Dayton Rd.

Cincinnati OH 45241

Profile #	Date In	Ticket #	RCRA Codes	Amount	Units	H Code	W Code	Manifest #
<b>Q1648</b>	<b>Sodium Bisulfate Solution</b>							
	12/29/2009	09-41635	D002	27	P	H071	W103	1997896FLE
	<b>Total For This Profile:</b>			27	P			
<b>X35373</b>	<b>Liquids, Varied</b>							
	4/10/2009	09-10296	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10303	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1999509FLE
	4/10/2009	09-10292	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1999509FLE
	4/10/2009	09-10302	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10295	D001,D022,D035,F002,F003,F005	450	P	H111	W609	1999509FLE
	4/10/2009	09-10300	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10297	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10298	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10294	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10301	D001,D022,D035,F002,F003,F005	450	P	H111	W609	1999509FLE
	4/10/2009	09-10299	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	4/10/2009	09-10293	D001,D022,D035,F002,F003,F005	450	P	H141	W609	1999509FLE
	6/26/2009	09-82270	D001,F003	450	P	H061	W609	1997666FLE
	11/11/2009	09-36187	D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	11/11/2009	09-36188	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	11/11/2009	09-36192	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	11/11/2009	09-36191	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	11/11/2009	09-36189	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	11/11/2009	09-36190	D001,D022,D035,F002,F003,F005	450	P	H061	W609	1997958FLE
	<b>Total For This Profile:</b>			8550	P			
<b>X79624</b>	<b>Silver Cyanide and Water</b>							
	6/26/2009	09-82271	D003,D011	450	P	H010	W107	1997666FLE
	<b>Total For This Profile:</b>			450	P			
<b>X79719</b>	<b>Chrome Water</b>							
	7/2/2009	09-82695	D006,D007,D008,D009	450	P	H141	W113	1997678FLE
	<b>Total For This Profile:</b>			450	P			

Hazardous Inventory Received  
Calendar Year 2009

Tuesday, January 19, 2010

Environmental Enterprises Inc  
4650 Spring Grove Avenue  
Cincinnati, OH 45232  
Voice: 513-541-1823  
Fax: 513-541-1638  
EPA ID: OHD083377010

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**Environmental Enterprises Inc - Lab - EPA ID:OHD987048337**

10163 Cincinnati-Dayton Rd.

Cincinnati OH 45241

<i>Profile #</i>	<i>Date In</i>	<i>Ticket #</i>	<i>RCRA Codes</i>	<i>Amount</i>	<i>Units</i>	<i>H Code</i>	<i>W Code</i>	<i>Manifest #</i>
<b>X78449</b>			<b>Cyanide Debris</b>					
	1/7/2009	09-70193	D003	24	P	H073	W002	1996468FLE
			<i>Total For This Profile:</i>	24	P			
<b>X78450</b>			<b>Mercury and Debris</b>					
	1/7/2009	09-70194	D009	24	P	H141	W002	1996468FLE
			<i>Total For This Profile:</i>	24	P			

*Hazardous Inventory Received**Calendar Year 2009**Tuesday, January 19, 2010**Environmental Enterprises Inc**4650 Spring Grove Avenue**Cincinnati, OH 45232**Voice: 513-541-1823**Fax: 513-541-1638**EPA ID: OHD083377010*



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>OH D987048337</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800) 392-1503</b>	4. Manifest Tracking Number <b>001995991 FLE</b>	
5. Generator's Name and Mailing Address <b>Environmental Enterprises Inc</b> <b>10163 Cincinnati-Dayton Rd.</b> <b>Cincinnati, OH 45241</b> (513) 672-8154						
6. Transporter 1 Company Name <b>Midwest Environmental Transport, Inc.</b>					U.S. EPA ID Number <b>OH0000000539</b>	
7. Transporter 2 Company Name					U.S. EPA ID Number	
8. Designated Facility Name and Site Address <b>Environmental Enterprises, Inc.</b> <b>4650 Spring Grove Avenue</b> <b>Cincinnati, OH 45232</b> (513) 541-1823					U.S. EPA ID Number <b>OH D083377010</b>	
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.
		1. RQ. Waste Flammable liquids, n.o.s., (Spent Solvents), 3, UN1993, PGII (D001)		002 DM 0100	G	
		2. RQ; Waste Flammable liquids, n.o.s., (Spent solvents); 3; un 1993; PG II; (D001)		005 DM 0250	G	
		3.				
		4.				
13. Waste Codes D001 D022 D035 F002 F003 F005						
14. Special Handling Instructions and Additional Information 1. X35373 ERG # 128 2. X35373 " " T-22 clean out EEI Work Order # 1. 79434-25 2. 79434-30 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Type Name: <b>Harold A. James II</b> Signature: <b>Harold A. James</b> Month: <b>10</b> Day: <b>26</b> Year: <b>10</b>						
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Type Name: <b>Richard Stitt</b> Signature: <b>Richard Stitt</b> Month: <b>05</b> Day: <b>26</b> Year: <b>10</b>					
	Transporter 2 Printed/Type Name: Signature: Month: Day: Year:					
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	18b. Alternate Facility (Generator) Manifest Reference Number: <b>FILED AUG 02 2010</b>					
	Facility's Phone: Month: Day: Year:					
	18c. Signature of Alternate Facility (Generator) Month: Day: Year:					
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. <b>H001</b> 2. <b>H001</b> 3. 4.					
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Type Name: <b>Dele Campbell</b> Signature: <b>Dele Campbell</b> Month: <b>07</b> Day: <b>13</b> Year: <b>10</b>						

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**ENVIRONMENTAL ENTERPRISES, INC.**  
**RESTRICTED WASTE NOTIFICATION & CERTIFICATION**

Generator: EEI Manifest Document No. 00995991FLE State Manifest No. \_\_\_\_\_  
 This shipment contains waste(s) restricted from land disposal under 40 CFR Part 268 and OAC Chapter 3745-59. A copy of this notice and all supporting analysis must be kept for three (3) years.

**INSTRUCTIONS**

- Column 1: List all waste codes that apply to this waste.  
 Column 2: Mark the appropriate treatability Group that applies to this waste at the point of Generation. NWW (Non-Waste Water) or WW (Waste Water). Wastewater is <1% total suspended solids and <1% total organic carbon.  
 Column 3: Enter legend if any for the subcategory that applies to this waste from the subcategory list below.  
 Column 4: Enter A for Restricted Waste Requiring Treatment to the Appropriate Treatment Standard. If this does not apply use Restricted Waste Notification Form 03.  
 Column 5: If D001-D043 or F001-F005, enter the Reference # for All underlying hazardous constituents that may be present in the waste from EEI's Restricted Waste Notification & Certificate Addendum for Underlying Hazardous Constituent Treatment Standards.

EEI Profile Number	1. Waste Code	2. Treatability Group	3. Subcategory Legend (if any)	4. How Waste must be Managed (A-N)	5. Reference # of all UHCs in waste for D001-D043, Soil & Debris Reference # of F001-F005 constituents
LS01391	D001 D004 D005 D007 D008 D009 D011 D018 D022 D027 D035 D039 F002 F003 F005 P022 P105 U052 U404	NWW	D1H, D9C	A	240 241 244 248 250 253 25 55 82 158 214 219 238 4 227

**CERTIFICATION! (Please sign)**

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA guidelines Document SW-846 EPA 600/2-80018 or on the thorough knowledge of the waste.

Signature

Title

Date

Codes	Legend #	Subcategory
D001	D1A	High TOC ignitable liquids, ≥10% TOC
	D1B	Ignitable characteristic wastes except high TOC >10% ignitable liquids
D003	D3A	Reactive Sulfides
	D3B	Other Reactives
	D3C	Water Reactive
	D3D	Reactive Cyanide
	D3E	Explosives
D006	D6A	Cadmium Containing Batteries
D008	D8A	Lead Acid Batteries
D009	D9A	Non-wastewater High Mercury-Organic Subcategory (≥ 260 PPM total Mercury)
	D9B	Non-wastewater High Mercury-Inorganic Subcategory
	D9C	Non-wastewater that contains ≤ 260 mg/kg total mercury (Low Mercury Subcategory)
F003	F3A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone, and/or methanol
F005	F5A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone, and/or methanol
	F5B	Contains only 2-Nitropropane
	F5C	Contains only 2-Ethoxyethanol
K069	K69A	Calcium Sulfate (Low Lead)
	K69B	Non-Calcium Sulfate (High Lead)
P092	P92A	Phenyl mercuric acetate non-wastewaters, regardless of their total mercury content, that are not incinerator residues or are not residues from RMERC
	P92B	All phenyl mercury acetate wastewaters
U151	U151A	Non-wastewaters that contain less than 260 mg/kg total mercury and are not residues from RMERC
	U151B	All (mercury) wastewaters

**HOW WASTE MUST BE MANAGED**

**A. RESTRICTED WASTE REQUIRING TREATMENT TO THE APPROPRIATE TREATMENT STANDARD**

This shipment contains restricted waste(s) that must be treated to comply with applicable treatment standards and/or prohibitions prior to land disposal.

For All other treatment standards use Restricted Waste Notification Form 03.

F001-F005 Spent Solvent and Inorganic Treatment Standards:

Please see 'EEI's Restricted Waste Notification & Certificate Addendum for Underlying Hazardous Constituent Treatment Standards' for treatment standard

F001 & F002	F003	F004	F005	Inorganics
44) Carbon Tetrachloride	4) Acetone	65 & 66) Cresols	25) Benzene	239) Antimony
48) Chlorobenzene	35) n-Butyl Alcohol	(m & p isomers)	43) Carbon Disulfide	240) Arsenic
81) o-Dichlorobenzene	68) Cyclohexanone	64, 65, & 66) Cresylic	144) Isobutyl Alcohol	241) Barium
157) Methylene Chloride	121) Ethyl Acetate	Acid Mixed (o, m, & p isomers)	158) Methyl Ethyl Ketone	242) Beryllium
214) Tetrachloroethylene	122) Ethyl Benzene		206) Pyridine	243) Cadmium
225) 1,1,1-Trichloroethane	124) Ethyl Ether	64) o-Cresols	219) Toluene	244) Chromium
226) 1,1,2-Trichloroethane	150) Methanol	170) Nitrobenzene		245) Cyanide (total)
233) 1,1,2-Trichloro-1,2,2-Trifluoroethane	159) Methyl Isobutyl Ketone			246) Cyanide (amenable)
227) Trichloroethylene	238) Xylene			247) Fluoride
228) Trichloromonofluoromethane				248) Lead
				249) Mercury (NWW from retort)
				250) Mercury (all others)
				251) Nickel
				252) Selenium
				253) Silver
				254) Sulfide
				255) Thallium
				256) Vanadium
				257) Zinc





HAROLD JAMES

## **POSITION DESCRIPTION**

*Environmental Services Division*

Position Title: Field Chemist

Revision Date: December 2011

### **POSITION DESCRIPTION**

The primary duties of a field chemist are to sample, characterize, and manage assorted waste materials. The field chemist should be knowledgeable in the different types of sampling methodology, tools and techniques. This requires the know-how to calibrate instrumentation. This person is responsible for preparing waste profiles, DOT descriptions, and manifests. The field chemist is HAZWOPER 40-trained. Typically, the work is conducted in Level D but sometimes work conditions are performed in Level B OR C.

The field chemist is capable of making informed decisions, and is methodical in his/her approach. Additional skills required for this position are provided below.

- Organization
- Observant
- Good note taking skills
- Studious
- Resourceful
- Detail oriented.

The field chemist is familiar with chemistry, RCRA regulations, and Department of Transportation (DOT) requirements.

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**3745-65-16 Personnel training.****(A)**

- (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (D)(3) of this rule.

*does this include LDRs?  
Yes.*

- (2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.
- (3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:
- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
  - (b) Key parameters for automatic waste feed cut-off systems;
  - (c) Communications or alarm systems;
  - (d) Response to fires or explosions;
  - (e) Response to ground water contamination incidents; and
  - (f) Shutdown of operations.

- (B) Facility personnel must successfully complete the program required in paragraph (A) of this rule within six months after January 7, 1983 or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after January 7, 1983 must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this rule.

- (C) Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule.

- (D) The owner or operator must maintain the following documents and records at the facility:



- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
  - (2) A written job description for each position listed under paragraph (D)(1) of this rule. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
  - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule; and
  - (4) Records that document that the training or job experience required under paragraphs (A), (B), and (C) of this rule has been given to, and completed by, facility personnel.
- (E) Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Effective: 12/07/2004

119.032 review dates: Exempt

Promulgated under: 119.03

Statutory authority: 3734.12

Rule amplifies: 3734.12

Prior effective dates: 04/15/1981, 01/07/1983, 12/07/2000





# HAZWOPER TRAINING

Apr. 19. 2012 8:28AM

No. 1500 P. 1

Time	Trainer	Module – Subject	Slides
<b>2 Hr</b>		<b>MODULE 1</b>	<b>10</b>
		Introduction and Course Objectives	
		Course Objectives	
		Basis for the Course	
		Regulatory Standard	
		OSHA Civil Penalties	
		Training Requirements	
		Employer's Responsibility	
		Emergency Response Staff (Levels = 5)	
		Retraining Requirements	
<b>2 Hr</b>		<b>MODULE 2</b>	<b>30</b>
		HazMat and HazWaste Definitions	10
		Regulatory Overview	20
<b>3 Hr</b>		<b>MODULE 3</b>	<b>33</b>
		HazMat Identification Systems	28
		MSDSs	
		Labeling	
		Emergency Response Guide	5
<b>2 Hr</b>		<b>EXERCISE MODULE 1</b>	<b>Exercise</b>
		HazMat Identification and ERG Exercise	
<b>3 Hr</b>		<b>MODULE 5</b>	<b>48</b>
		Toxicology	
		Routes of Entry	
		Affecting Factors, Signs, Symptoms	
		Exposure Limits	
		Specific Types of Hazards	
<b>3 Hr</b>		<b>MODULE 6</b>	<b>36</b>
		Personal Protective Equipment	
		Respiratory Protection	
<b>3 Hr</b>		<b>EXERCISE MODULE 2</b>	<b>Exercise</b>
		Level A – Dress Out	
<b>2 Hr</b>		<b>EXERCISE MODULE 3</b>	<b>Exercise</b>
		Level B – Dress Out	

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rec'd 12/17/2012 4/19/2012



<b>2 Hr</b>		<b>EXERCISE MODULE 4</b>	<b>Exercise</b>
		Level C Dress Out	
<b>3 Hr</b>		<b>MODULE 7</b>	<b>23</b>
		Spill Control – Containment, Confinement, etc	15
		Decontamination	8
<b>2 Hr</b>		<b>EXERCISE MODULE 5</b>	<b>Exercise</b>
		Decontamination/Spill Control	
<b>2 Hr</b>		<b>MODULE 8</b>	<b>50</b>
		Incident Command System and Site Organization	15
		Problem Assessment	15
		Entry Considerations	15
		Termination Procedures	5
<b>2 Hr</b>		<b>MODULE 8</b>	<b>50</b>
		Emergency Response and HazWaste Contingency Plan	
<b>2 Hr</b>		<b>MODULE 9</b>	
		Instrumentation and Equipment	
<b>1 Hr</b>		<b>EXERCISE MODULE 6</b>	<b>Exercise</b>
		Instrumentation and Equipment	
<b>2 Hr</b>		<b>EXERCISE MODULE 7</b>	<b>Exercise</b>
		Plant Tour	
<b>1 Hr</b>		<b>EXERCISE MODULE 8</b>	<b>Exercise</b>
		Table Top Exercise Scenario	
<b>3 Hr</b>		<b>EXERCISE MODULE 9</b>	<b>Exercise</b>
		Field Exercise Scenario	
		<b>EQUIPMENT NEEDS</b>	
		• PPE	
		• Instrumentation	
		• Drums/Containers/Bottles	
		• Labels	
		• Decontamination	
		• Containment Material	



		• Video Tapes	





**ENVIRONMENTAL ENTERPRISES INCORPORATED**



**This is to certify that**

***HAROLD A. JAMES II***

**Has successfully completed the course entitled**

**HAZWOPER 8-Hour Worker Refresher Training**

**pursuant to OSHA 29 CFR 1910.120**

**January 25, 2012**

*Gerald Nocks CET*

**Gerald Nocks, CET  
Corporate EH&S Manager**



ENVIRONMENTAL ENTERPRISES INCORPORATED



This is to certify that

SKIP JAMES

Has successfully completed the course  
entitled

40 Hour HAZWOPER Worker Training

PURSUANT TO OSHA 29 CFR 1910.120

September 3-8, 1997

William L. Krum, OHST, CHMM

Senior Environmental, Health, and Safety Specialist  
Environmental Enterprises, Inc



Last Name	First Name	Hire Date	Rehire Date	Job Title/Job Description
Boyer	Brad <sup>12/16/11</sup> <sup>5/16/88</sup>	9/14/1992	6/5/2006	Field Services Manager/Field Chemist/Driver
Chalk	Justin <sup>12/16/11</sup> <sup>8/25/11</sup>	7/25/2011		Field Technician
Clark	Ronald <sup>12/16/11</sup> <sup>11/15/03</sup>	8/14/2001		Field Technician
James	Harold <sup>9/8/97</sup> <sup>8/25/12</sup>	9/23/1988		Field Chemist/Driver
Wise	Keith <sup>12/16/11</sup> <sup>5/24/06</sup>	5/30/1996		Business Development Manager

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rec'd. 12/17/2012 SRB





## **ATTACHMENT D**

### **Inspection Follow-up**



# ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY  
4650 Spring Grove Ave.  
Cincinnati, Ohio 45232  
(513) 541-1823  
Fax: (513) 541-1638  
[http:// www.eeienv.com](http://www.eeienv.com)  
EPA ID#: OHD 083377010



OFFICE / LABORATORY  
10163 Cincinnati - Dayton Rd.  
Cincinnati, Ohio 45241  
(513) 772-2818  
Fax: (513) 782-8950  
(800) 722-2818

May 4, 2012

Ms. Sue Rodenbeck Brauer  
Environmental Scientist  
USEPA Region 5 (LRD-8J)  
77 West Jackson Blvd.  
Chicago, IL 60604

Dear Ms. Brauer,

It was a pleasure meeting with you and Pam Hull on April 18<sup>th</sup> and 19<sup>th</sup> relative to a generator inspection at Environmental Enterprises, Inc. During your inspection several deficiencies were noted. I attached some items that are responsive to those deficiencies.

A diagram was added to the SPCC plan which included the trench drains and accumulator locations. As I indicated, the building is spill contained and no discharges can migrate to outside drains or streams from the interior of the building. Enclosed please find the trench drain and accumulator location map for the building in question. The Oil Spill Prevention Plan addresses containment features for hazardous waste transfer area included within the Field Service bays.

The hazardous materials and waste operations health and safety contingency plan was also modified to include evacuation plan from the Field Service bays. The prior plan covering the laboratory had its own evacuation plan, but is no longer in use. The updated plan was sent via certified mail to the local fire department and medical facility and the certified mail receipts are attached from these entities. The contingency plan was also modified to include the home addresses of Dale French and myself.

A record of the spill response supply inventory was not on our inspection form because EEI uses these bays as a warehouse for spill response equipment. Nevertheless, the inspection log has been modified to include an inspection of the inventory of spill

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response supplies. Also attached is a list of spill response supplies that are typically on hand.

Although not part of EEI, we have provided Midwest Fleet Services "used oil" signs for labeling their totes and drums and the Field Service group is scheduling the annual clean out of the trenches and accumulators. Per your suggestion, we will run a TCLP of the material prior to disposal.

I hope that this addresses the deficiencies that we discussed. If you have any questions on this please do not hesitate to give me a call, my direct line is 513-782-8956.

Sincerely,  
Environmental Enterprises, Inc.



Daniel J. McCabe  
President

Enclosures: SPCC Diagram, Revised Contingency Plan, Copies of Certified Mail Receipts

CC: Pam Hull  
Brad Boyer

# ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY  
4650 Spring Grove Ave.  
Cincinnati, Ohio 45232  
(513) 541-1823  
Fax: (513) 541-1638  
<http://www.eeienv.com>  
EPA ID#: OHD 083377010



OFFICE / LABORATORY  
10163 Cincinnati - Dayton Rd.  
Cincinnati, Ohio 45241  
(513) 772-2818  
Fax: (513) 782-8950  
(800) 722-2818

May 30, 2012

Ms. Sue Rodenbeck Brauer  
Environmental Scientist  
USEPA Region 5 (LRD-8J)  
77 West Jackson Blvd.  
Chicago, IL 60604

Dear Ms. Brauer,

As a follow-up to your inspection in April, we have secured a sample from the trench drain and accumulators in the Midwest Fleet Services building and have tested it for volatile organic compounds using Test America. We have received results which indicate less than the detection limits for all VOC's. A copy of this report is enclosed for your review. The annual clean out of these will continue to be managed as Non-Regulated Waste.

If you have any questions on this please do not hesitate to give me a call at your convenience, my direct line is 513-782-8956.

Sincerely,  
Environmental Enterprises, Inc.

Daniel J. McCabe  
President

Enclosures: Test America Report

CC: Pam Hull  
Brad Boyer

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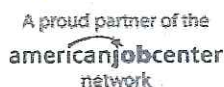
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## Certification Search Results: Certification Information

### Certified Environmental Trainer - Management & Transportation of Hazardous Materials & Waste (CET)

#### Certification Description

NESHTA (then the National Environmental Training Association) began the development of the CET program in 1986 in response to requests by members – at that time primarily community college-based, U.S. EPA-designated wastewater operator training centers – and as a way to encourage trainer competency in their field. As a voluntary certification, the certification measures the knowledge of candidates in basic adult education (as one indicator of competency) and confirms the candidates knowledge in the technical specialty area of areas in which they instruct.

#### Certifying Organization

National Environmental, Safety & Health Training Association  
5320 North 16th St., Suite 114, Phoenix, AZ 85016  
<http://neshta.org/>

#### Certification Details

- Work Experience Required? **Yes**
- Oral or Written Exam Required? **Yes**
- Renewal Required? **Every 3 Year(s)**
- Renew through Continuing Educational Units(CEU)? **Yes**
- Renew through Continuing Professional Development(CPD)? **Yes**
- Does applicant have choice of at least two options from above for renewal (CEU, CPD, or exam)? **No**

#### For more information

[Certified Environmental Trainer - Management & Transportation of Hazardous Materials & Waste Website](#)



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## CET Roster, as of 11/01/2012

This roster is provided solely to affirm the possession and active status of an individual's CET credential. This roster is updated monthly. Refer queries about individuals claiming CET, whose name does not appear on this roster, to Linda Charles (linda@bcsp.org).

Certification is by specialty areas, as follows:

**All-Hazards Emergency Response (ER)**  
**Drinking Water Technology (DW)**  
**Management and Transportation of Hazardous Materials and Waste (HM)**  
**Occupational Safety and Health (OS)**  
**Radiation Protection (RP)**  
**Wastewater Technology (WW)**

Last Name	Full Name	ER	WT	MTHMW	WW	OSH	RP	City	State/Territory
Acree	James M. Acree, CET	1	0	0	0	1	0	West Fork	AR
Adams	Jay Adams, CET	0	1	0	1	0	0	New Orleans	LA
Akkerman	Daniel J. Akkerman, CET, CIT	0	0	0	0	1	0	Duvall	WA
Allen	Stephen J. Allen, CET, CIT	0	0	0	0	1	0	Tacoma	WA
Allen	Mr. James R. Allen, CET	0	0	0	0	1	0	Hobbs	NM
Ambrose	Jeffrey D. Ambrose	0	0	0	0	1	0	Ellicott City	MD
Andreas	Dr. Christine M. Andreas, CET	0	0	1	0	0	0	Pennington	NJ
Ashmore	Randy T. Ashmore, CET	1	0	0	0	1	0	Woodbury	CT
Avrich	Alan Avrich, CET, CIT	0	0	0	0	1	0	Fulton	NY
Bahun	Thomas J. Bahun, CET	0	0	0	1	1	0	Gorham	ME
Barnes	Mr. Vinson Scott Barnes, CET	0	1	0	1	0	0	Easley	SC
Barnhouse	Mr. David A. Barnhouse, CET, CIT	0	0	0	0	1	0	Yigo	GU
Barry	John A. Barry, CET, CIT	1	0	0	0	0	0	Long Island City	NY
Bastian	Lawrence J. Bastian, CET	0	0	0	1	0	0	White Plains	MD
Beasley	Keith L. Beasley, CET	1	0	0	0	1	0	Chestnut Hill	MA
Bedrosian	Gary Bedrosian, CET	0	0	1	0	0	0	West Milford	NJ
Beerbower	Joyce Beerbower, CET, CIT	0	0	0	0	1	0	Reston	VA
Beiro	Mr. Henry H. Beiro, CET	0	0	0	0	1	0	Huron	OH
Belancik	Laura C. Belancik, CET	0	0	0	1	1	0	Meriden	CT
Belcher	Mr. Gordon K. Belcher, CET	0	1	0	1	0	0	Centertown	MO
Bender	Jack R. Bender, CET	0	0	0	0	1	0	Findlay	OH
Bennett	Dewey W. Bennett, CET	0	0	0	0	1	0	Wasilla	AK
Bianco	George A. Bianco, Jr., CET, CIT	0	0	0	1	0	0	North Scituate	RI
Bird	David W. Bird, CET	0	0	0	0	1	0	Savannah	GA
Blackburn	Theodore L. Blackburn, CET	0	0	0	0	1	0	Weare	NH
Blanchard	Darrel A. Blanchard, CET	0	1	0	1	0	0	West Liberty	OH
Bohannon	Robert R. Bohannon, CET	0	0	1	0	1	0	Phoenix	AZ
Booth	David R. Booth, CET	0	1	1	1	0	0	Lake Charles	LA
Bowles	Joy L. Bowles, CET, CIT	0	0	1	0	1	0	Dripping Springs	TX
Bowles	Carolyn Bland Bowles, CET	0	0	0	0	1	0	Washington	DC
Bowman	Mr. Jeff R. Bowman, CET	0	0	1	0	0	0	College Station	TX
Bradley	Barbara R. Bradley, CET	0	1	0	1	0	0	The Villages	FL
Bradley	Terence Bradley, CET	0	1	0	0	1	0	Millersville	MD
Bradley	Bruce B. Bradley, CET, CIT	0	0	0	0	1	0	Escondido	CA
Braun	Cynthia E. Braun, CET	1	0	0	0	1	0	Littleton	CO
Breeding	Dr. David C. Breeding, CET, CIT	0	0	1	0	1	0	Bryan	TX
Breimhurst	Martin H. Breimhurst, CET	0	1	0	0	1	0	St. Paul	MN
Brett	Eric C. Brett, CET	0	0	1	0	1	0	Wilton	NH
Briggs	Corey W. Briggs, CET, CIT	0	0	1	0	1	0	North Quincy	MA
Brislin	Thomas A. Brislin, CET	0	0	1	0	1	0	Apollo Beach	FL

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[http://www.bcsp.org/pdf/CET\\_Roster.pdf](http://www.bcsp.org/pdf/CET_Roster.pdf) (11/14/2012)

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Mansfield	Dr. Norman Jerome Mansfield, CET,	0	0	1	0	1	0	Paducah	KY
Maranciak	Jeffrey A. Maranciak, CET	0	0	0	0	1	0	Houston	TX
Markelz	Ms. Pamela B. Markelz, CET	0	0	0	0	1	0	Sheboygan	
Martinek	Richard A. Martinek, CET	0	0	1	0	1	0	Houston	TX
Materia	Robert Materia, CET	0	0	1	0	1	0	Princeton	NJ
McArdle	Mr. Philip H. McArdle, CET	1	0	0	0	1	0	Carmel	NY
McCabe	Charles T. McCabe, CET	0	0	0	0	1	0	South Glen Falls	NY
McCain	Ursula B. McCain, CET	0	0	0	0	1	0	Winter Springs	FL
McFarland	A. Scott McFarland, CET	0	0	0	1	0	0	Wilton	CT
McGuinness	Bridget E. McGuinness, CET, CIT	0	0	0	0	1	0	Lowell	MA
McHugh	Kevin B. McHugh, CET	0	0	0	0	1	0	Albertville	AL
McMichael	Regina McMichael, CET	0	0	0	0	1	0	Clemson	SC
Meek	Kenneth R. Meek, CET, CIT	1	0	1	0	1	0	Pueblo West	CO
Metcalf	Michael A. Metcalf, CET, CIT	0	0	1	0	0	0	Houston	TX
Meyers	Jon D. Meyers, CET	0	0	0	0	1	0	Lexington	KY
Miller	Ryan K. Miller, CET	0	0	1	0	0	0	Spotsylvania	VA
Miller	Mr. Dean A. Miller, CET, CIT	0	0	0	0	1	0	Brea	CA
Miller	Mr. Brian W. Miller, CET, CIT	0	1	0	1	0	0	Garrett	IN
Miller	Douglas L. Miller, CET	0	0	0	1	0	0	South Portland	ME
Millet Foreman	Dinah S. Millet Foreman	0	1	0	1	0	0	Rogersville	AL
Mitchell	Laurie Jean Mitchell, CET	0	0	0	0	1	0	Richland	WA
Mixer	William G. Mixer, III, CET	0	1	0	1	0	0	Casper	WY
Mizula	Bernard Mizula, CET, CIT	0	0	0	0	1	0	Hollis	NH
Montejano	Joel L. Montejano, CET, CIT	1	0	0	0	1	0	Burke	VA
Moore	William M. Moore, Jr., CET	0	0	1	0	1	0	Highland	MI
Mooring	Dr. James A. Mooring, CET	0	1	0	0	0	0	Houma	LA
Moulton	Mr. Mark Moulton, CET	1	0	0	0	0	0	Woodinville	WA
Mullins	Timothy M. Mullins, CET	0	1	0	1	0	0	Douglasville	GA
Mundy	Mr. Michael K. Mundy, CET	1	0	0	0	1	0	Cincinnati	OH
Murphree	Larry V. Murphree, CET	1	1	0	1	0	0	New Albany	MS
Nash	William K. Nash, CET, CIT	1	0	0	0	1	0	Clay Center	KS
Nash	Gary D. Nash, CET, CIT	0	0	0	0	1	0	Boca Raton	FL
Needham	Michael Needham, CET, CIT	0	0	0	0	1	0	Albany	NY
Neufeld	James H. Neufeld, CET	0	0	0	0	1	0	Hermiston	OR
Niang	Aisha Niang, CET	0	0	0	1	0	0	Houston	TX
Noakes	Darryl W. Noakes, CET	0	0	0	1	0	0	Front Royal	VA
Nutt	Jacquelyn J. Nutt, CET	0	0	1	0	0	0	Republic	WA
Oberuc	Joseph M. Oberuc, CET, CIT	0	0	0	0	1	0	Ogden	UT
O'Brien	Michael J. O'Brien, CET	0	0	1	0	1	0	Hobart	IN
O'Keefe	Mr. Richard J. O'Keefe, CET, CIT	1	0	0	0	1	0	Woburn	MA
Olesen	Annette T. Olesen, CET	0	0	0	0	1	0	Media	PA
Owen	Michael V. Owen, CET	0	0	0	0	1	0	Glenelg	MD
Owings	David R. Owings, CET	0	0	0	0	1	0	Ketchikan	AK
Palermo	Dr. Robert S. Palermo, CET	0	0	0	0	1	0	Reading	MA
Palmer	Stevan T. Palmer, CET	0	1	0	0	0	0	Sparks	NV
Panarelli	Joseph Panarelli, CET	0	0	1	0	1	0	Hicksville	NY
Pankow	Neil A. Pankow, CET	0	0	1	0	0	0	Yorkville	IL
Pappas	Chris T. Pappas	0	0	1	0	1	0	Winter Haven	FL
Passerini	Mark A. Passerini, CET	0	0	0	0	1	0	Lexington	SC
Paul	Richard R. Paul, CET	0	0	0	0	1	0	Suwanee	GA
Pedone	Dr. Marco J. Pedone, CET	1	0	0	0	1	0	Ossining	NY
Pendleton	Tyler Pendleton, CET, CIT	0	0	0	0	1	0	Hilliard	OH
Peres	Daron L. Peres, CET	0	0	0	0	1	0	Baltimore	MD
Perla	Donald M. Perla, CET	0	0	0	0	1	0	Lunenburg	MA
Perry	Franklin H. Perry, CET, CIT	0	0	0	0	1	0	Franklin	TX
Peters	T L Peters, CET, CIT	0	0	0	0	1	0	Forney	TX
Petkosh	Gregory Petkosh, CET	0	0	0	0	1	0	Cleveland	OH
Petri	Rodney D. Petri, CET	0	0	0	0	1	0	Fort Washington	PA

Gerald  
no Nocks

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From: Sue Brauer/R5/USEPA/US  
To: linda@bcsp.org,  
cc:  
bcc:  
Subject: CET certificate holder as of 12/16/11?  
Posted Date: 11/26/2012 11:39 AM  
Distribution List: <linda@bcsp.org>,

Hi Linda,

Would you please determine whether Gerald Nocks held a CET credential as of 12/16/11? Thanks for your help.

Sue Rodenbeck Brauer  
Compliance Section 2, RCRA Branch  
U.S. EPA, Region 5 (LR-8J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
phone (312) 353-6134  
fax (312) 408-2231  
brauer.sue@epa.gov

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From: Sue Brauer/R5/USEPA/US  
To: Linda@bcsp.org,  
cc:  
bcc:  
Subject: CET as of 4/16/2011?  
Posted Date: 11/14/2012 12:56 PM  
Distribution List: <Linda@bcsp.org>,

Hi Linda,

I obtained your email address from the internet. I reviewed the CET roster as of 11/1/2012 and didn't see a trainer.

Would you please inform me by email whether Gerald Nocks held a CET credential as of 4/16/2011?  
Thank you for your time.

Sue Rodenbeck Brauer  
U.S. EPA, Region 5 (LR-8J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
phone (312) 353-6134  
fax (312) 408-2231  
brauer.sue@epa.gov

